



Department of the Interior

Bureau of Land Management

Lakeview Resource Area
Lakeview District Office
1301 South G Street
Lakeview, Oregon 97630

January 2003

Lakeview Proposed Resource Management Plan and Final Environmental Impact Statement

Volume 4 [of 4] — *Comment Responses and Reprinted Letters*



As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interest of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. Administration.

BLM/OR/WA/PT-02/031+1792

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.07
L354
2003
v.4

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List of Respondents/Letter Numbers in Order Received

1	Ray & Edna Wagner	53	James Lynch
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17	Linda Jerofke (Burns Paiute Tribe)	69	Dr. Mark R. Hanschka
18	Walt Minteski	70	Order of the Antelope Foundation
19	Cornerstone Industrial Minerals	71	Rob & Kristi Elder
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29	James T. Post	81	Dennis P. Kenny
30	Sally Ferguson	82	Nancy Tracy
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32	Howard Faul	84	Nick & Holly Forrest
33	Robbie Lake	85	Dorothy Layman
34	Ryan T. Davidson	86	Dave Sherman
35	Erik Muller	87	Patricia Dowd
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38	Larry Scofield	90	Elaine Rees
39	Lynn Krupa	91	Peggy Robinson
40	Shirley Cameron	92	Charyn McDonnell
41	George B. Hug	93	Jane & David Meyer
42	David Imholt	94	Andy Anderson
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44	Bob Atiyeh	96	Florence Wagner
45	Harry F. Brevoort	97	Allen R. Sorensen
46	Connie Lonsdale	98	Stuart Garrett (Native Plant Society of Oregon)
47	Patrick L. Conner	99	Amy Schoener
48	Lawrence Pagen	100	Ken Snider
49	Mike R. Dunbar	101	Peter Zadis
50	Mark Lamont	102	Irene Vlach
51	Harold H. Winegar	103	Laurie Solomon
52	James & Alice Nork	104	John Gaffin

- 105 Sara Nunn
- 106 Gerilyn Baxter & John Ebeling
- 107 Klamath Tribes
- 108 John Griffin
- 109 Penelope Kaczmarek and others
- 110 Robert Pollock
- 111 Patricia Sims
- 112 Jon Tilles
- 113 Harold Hotchkiss
- 114 Jerry & Mitzi Jones
- 115 Don Webb (Institute for Wildlife Protection)

The following e-mails, 116–181, were forwarded from Oregon Natural Desert Association by regular mail

- 116 Benjamin Haile
- 117 Alice Elshoff
- 118 Laura Zadis
- 119 Dennis J. Lenz
- 120 Martin Lichtcsien
- 121 James Scarborough
- 122 Francis D. Slider
- 123 Richard Spotts
- 124 Erin Madden
- 125 Daniel R. Patterson
- 126 William Gross
- 127 Jack Leishman
- 128 Jean Blackwood
- 129 Eli Long
- 130 Doug Heiken
- 131 Shannon Clery
- 132 John Perry
- 133 Marty Bergoffen
- 134 Barbara Warner
- 135 Ellen Sweet
- 136 Suzanne Artemieff
- 137 Stan Kramer
- 138 Jason Clark
- 139 Nathalie Hellot
- 140 Richard Lund
- 141 Henry Lagergren
- 142 Mark Goddard
- 143 Sharon Cavallo
- 144 Theodore Mertig
- 145 Peter Zadis
- 146 Bryan McNamara
- 147 Timothy Coleman
- 148 Greg Harder
- 149 Eli Galla
- 150 James Facette
- 151 Shawn Dicken
- 152 Pandora Rose
- 153 Benjamin Short
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- 156 Joanne Cockerill
- 157 Kevin & Tinal Frosted
- 158 Brian Litmans
- 159 Chris Deiss
- 160 Bill Stern
- 161 Elaine Charkowski
- 162 Karen Piter
- 163 Jack Krieger
- 164 Frank Payne
- 165 Anne Aurand
- 166 Dennis Fisher
- 167 Mark Salvo, American Lands Alliance
- 168 Fred Fleetwood
- 169 Barry Armentrout
- 170 Joanne Vinton
- 171 Ruth Blyther
- 172 Annalee Cobbett, JD
- 173 Arthur Farley
- 174 Stan Liskey
- 175 Richard Ray
- 176 Kathy Clarke
- 177 Bobbie Dee Flowers
- 178 Bob Brister
- 179 Elena Benedi
- 180 Lynn Cruz
- 181 David Moenkhaus
- 182 John Berry
- 183 Patricia Garoutte
- 184 Larry Utley
- 185 Erik Fisher
- 186 Reid Schuller
- 187 John Shafer
- 188 Candace Guth
- 189 John Lane
- 190 Micahel Borman
- 191 Bill Tattam
- 192 Mark Davis
- 193 Noah Ribner
- 194 Michael Piehl
- 195 Carolyn Eckel
- 196 Jennifer L. Seamans
- 197 Hilary Ort Garrett
- 198 Torsti Rouainew
- 199 C. Schwison
- 200 Donald Fontenot
- 201 Neil Blatner
- 202 Carol Porto
- 203 Joe Wobili
- 204 Jeffery K. Fryer
- 205 Klindt Vielbig
- 206 Sandi Scheinberg
- 207 Nancy J. Chapman
- 208 M. Park
- 209 Harry Anderton
- 210 Rob & Marie Holt

- | | | | |
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| 211 | Marjorie Curtis | 266 | Klamath Tribes (Natural Resources Department) |
| 212 | Jeff Lockwood | 267 | Dan & Laury Cron |
| 213 | Peter Illyn | 268 | Alan Withers |
| 214 | R. Carios | 269 | Joe Cahill |
| 215 | Donna Harlan | 270 | Jeffery Allen Kee |
| 216 | Sierra Club Grazing Committee | 271 | George Lea (Public Lands Foundation) |
| 217 | John O'Keeffe | 272 | Southeast Oregon Resource Advisory Council |
| 218 | Sid Houpt | 273 | A.K. Majors (Land Resource Consulting) |
| 219 | Brad Winters | 274 | Randy Drake |
| 220 | Friends of Living Oregon Waters | 275 | Mike Peterson (The Lands Council) |
| 221 | Steve Peterson | 276 | Bonneville Power Administration |
| 222 | Diana Popp & David Riley | 277 | Oregon Department of Environmental Quality |
| 223 | Lake County Board of Commissioners | 278 | Cleon Puetz |
| 224 | David F. Ortwein | 279 | Environmental Protection Agency (Region 10) |
| 225 | Deanna M. Johnston | 280 | W.C. Laird (Laird Ranch) |
| 226 | Lakeview Soil and Water Conservation District | 281 | Alan Bach |
| 227 | Lake County Farm Bureau | 282 | Mike Getty, Hunters for Conservation |
| 228 | Oregon Natural Desert Association | 283 | Deschutes Wildlife District (ODFW) |
| 229 | Tim Withee | 284 | Kathy & Ken Kruse (form letter) |
| 230 | Dana Visse | 285 | Randy Kruse (form letter) |
| 231 | Richard Wilhelm | 286 | Christina Kruse/Randy Christian (form letter) |
| 232 | Leon Wilbanks | 287 | Shari & Claude Blackman (form letter) |
| 233 | Lin Kincannon | 288 | Scott & Jana Kittredge (form letter) |
| 234 | Max Hueftle | 289 | Millie & Lee Shelton |
| 235 | Jim Steitz | 290 | Delores Raedel |
| 236 | Brent Fenty | 291 | John Widenoja |
| 237 | Dr. Mha Atma S Khalsa | 292 | Raymond Grucza (form letter) |
| 238 | Christie Dunn | 293 | Dan Maple (form letter) |
| 239 | Dr. Keene Hueftle | 294 | Petition (496 signatories) |
| 240 | Barb Potter | 295 | Lee & Fran Baxter |
| 241 | Derrick Knowles | 296 | Bruce Brandenburg |
| 242 | Paul Suter | 297 | Kathleen Kruse (letter with attached petitions) |
| 243 | Sierra Club (Juniper Group) | 298 | Kerry & Carmen Cardwell |
| 244 | Simon Harding | 299 | Betty Chapman |
| 245 | Jon Cain | 300 | Meg Pick (form letter) |
| 246 | Cheryl Stomps | | |
| 247 | Kurt P Herzog | | |
| 248 | Greg & Catherine Baker | | |
| 249 | Karen Coulter (League of Wilderness Defenders) | | |
| 250 | Douglas R. Werme | | |
| 251 | Borden Beck | | |
| 252 | Ron Grace | | |
| 253 | Kate Scott | | |
| 254 | Doug Oien | | |
| 255 | John & Theresa Taylor | | |
| 256 | John Stone | | |
| 257 | Oregon Department of Fish & Wildlife | | |
| 258 | Dick Bradbury | | |
| 259 | T. E. Downs | | |
| 260 | Tom Sedgewick & Molly Connors | | |
| 261 | Troy Smith | | |
| 262 | Buddy Laxague | | |
| 263 | Myron L. Steward | | |
| 264 | Maria & Kenny Cade | | |
| 265 | Western Watersheds Project | | |

Letters 301–320 were form letters with no return addresses

Abbreviations and Acronyms

Reader note: Refer to the list below for abbreviations or acronyms that may be used in this document.

ACEC ~ area of critical environmental concern
APHIS ~ Agricultural Plant and Animal Health Inspection Service
AUM ~ animal unit month
BIA ~ Bureau of Indian Affairs
BLM ~ Bureau of Land Management
BMP ~ best management practice
BOR ~ Bureau of Reclamation
CAA ~ "Clean Air Act"
CFR ~ "Code of Federal Regulations"
CWA ~ "Clean Water Act"
DLCD ~ Department of Land Conservation and Development
DOD ~ Department of Defense
DOE ~ Department of Energy
DOI ~ Department of the Interior
EIS ~ environmental impact statement
EPA ~ Environmental Protection Agency
FAA ~ Federal Aviation Administration
FERC ~ Federal Energy Regulatory Commission
FLPMA ~ "Federal Land Policy and Management Act"
HAZMAT ~ hazardous materials
ICBEMP ~ Interior Columbia Basin Ecosystem Management Project
IMP (wilderness) ~ "Interim Management Policy for Lands Under Wilderness Review" 1995
ISA ~ instant study area
LCDC ~ Land Conservation and Development Commission
LRA ~ Lakeview Resource Area
NCA ~ national conservation area
NEPA ~ "National Environmental Policy Act"
NRHP ~ National Register of Historic Places
NOAA ~ National Oceanographic and Atmospheric Administration
NPS ~ National Park Service
ODA ~ Oregon Department of Agriculture
ODEQ ~ Oregon Department of Environmental Quality
ODF ~ Oregon Department of Forestry
ODFW ~ Oregon Department of Fish and Wildlife
ODOT ~ Oregon Department of Transportation
OHV ~ off-highway vehicle
ONHP ~ Oregon Natural Heritage Program
PRIA ~ "Public Rangelands Improvement Act"
RMP ~ resource management plan
RNA ~ research natural area
SMA ~ special management area
TNC ~ The Nature Conservancy
USDA ~ U.S. Department of Agriculture
USDI ~ U.S. Department of the Interior
USFS ~ U.S. Forest Service
USFWS ~ U.S. Fish and Wildlife Service
USGS ~ U.S. Geological Survey
VRM ~ visual resource management
WSA ~ wilderness study area
WSR ~ wild and scenic river

Appendix A

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Comment Responses and Reprinted Letters

Introduction

A total of 320 comment letters was received on the Draft RMP/EIS. Approximately 150 letters were form letters or primarily "votes" for one alternative or another. About 90 of these form letters consisted of emails sent by members of ONDA. About 76 letters contained what were considered substantive comments. In addition, a petition containing almost 500 signatures was sent, opposing proposed road and camping area closures in the northern part of Lake County.

Letters containing substantive comments have been printed along with comment responses in this volume.

Only a single representative letter for generic or form letters, and appropriate comment responses, was included to reduce the size of this volume. The letters are printed in chronological order based on the date of receipt. Each letter was assigned a number. The list of respondents and letter number assignments is given in the preceding pages. Numerous changes were made to the document in response to substantive public, Tribal, agency, and internal comments. These changes are highlighted as underlined text throughout Volumes 1 and 2.

Aug. 10 - 2001

Bureau of Land Management
 Lakeview, Or. 97630
 Mr. Scott Lawrence

I have been talking with Dan Stevenson concerning more pasture land.. He told me to make a request to Bureau of Land Management through you.

In this request I would like to apply for all or a part of this property: From our property to Highway 510 right of way to the County Road at the top of the hill.

We are interested in finding a way to meet our needs with your approval. and to stay friends with our neighbors.

Attached map.

Sincerely

Ray & Edna Wagner
 P.O. Box #0
 Lost Rock, Or. 97630

RECEIVED
 AUG 16 2001
 LAKEVIEW, BLM.

1-1

1-1: The LRA staff has reviewed your request to include certain public land in Land Tenure Zone 3 for disposal (see revised Table O2-1, Appendix O). We have concluded that the lands involved contain resource values which warrant retention in BLM ownership or are lands which may be considered for exchange, provided the BLM receives land with equal or greater resource values.

L-1

Melvin R. Adams
1516 Goethals
Richland, WA 99352

November 3, 2001

Mr. Scott Florence
Bureau of Land Management
HC10 Box 337 - 1300 South G Street
Lakeview, OR 97630

Subject: Comments on Draft Lakeview Resource Management Plan
and Environmental Impact Statement (EIS)

Dear Mr. Florence;

In general, the preferred alternative appears to be reasonable and balanced, but there are several specific areas where the EIS is incomplete and where the preferred alternative does not fully meet the stated management goals. My areas of concern include: management of rock art sites, the proposed High Lakes ACEC, management of redband trout fisheries in Deep Creek and the Chewaucan River, Shirk Ranch and Colvin Lake and Colvin Timbers.

Management of Rock Art Sites

In general, where rock art sites are mentioned in the EIS, for instance, in connection with the High Lakes ACEC; their importance is greatly understated. Lake County in general and the High Lakes region in particular contain rock art sites of national importance. The Long Lake site is a "world class" rock art site that remains to be fully and adequately studied and interpreted. Alas, the BLM approach to management of rock are seems to be to hide the sites in secrecy and to deny access. (I tried for two years to get information via the Freedom of Information Act and was not successful.) The proposed closure of the road to Long Lake is another example of this approach. However,

2-1: It is against the principle of site protection to identify the location of all sites such as rock art. Locations of sites are exempt by law from Freedom of Information Act request. Many sites open to the public have been visited and in every instance damaged by the public. The purpose of the ACEC is not just to highlight the rock art but rather to deal with a range of sites and values of cultural importance. The BLM does intend to create a list of sites where tours and visitation can take place. The BLM does intend to create an education program dealing with rock art in the District. The road parallel to Long Lake will remain open to vehicle access. People currently have to get out of their vehicles to view the rock art. If not, they must drive their vehicles cross county across an archaeological site and ecologically sensitive area (wet meadow) to reach the rim. While not every site will be directly accessible by vehicle, there will be a number of sites identified where the disabled or elderly can reach them without walking. However, short of major development of recreational facilities, none of the sites will have more than primitive access over very rough terrain.

the secrecy/deny access approach flies in the face of the stated objectives to provide recreational and educational opportunities.

I understand the concern about vandalism of rock art sites, but I think the damage is overstated in the EIS. Most of the damage I have noticed occurred before BLM even existed with the exception of some spray paint vandalism on sites right next to highway 395 at Abert Rim. Certainly the statements made on page 2-58 of the EIS about devil worship, New Age religious practices and non-Native use for financial gain appear to be speculative, inflammatory and inappropriate for an EIS document. (I guess one could assume from the EIS remarks that Native use for financial gain would be okay or that destruction of a site by archaeologists and their digs would be fine or that Baptist or other Christian religious practice would be acceptable at the site.)

The current BLM approach to rock art management is like trying to hide the Metropolitan Museum of Art and then denying access when people discover it just because a few people might try to steal a painting. What a museum does is hire guards, provide tours and educational opportunities. In particular, the proposed closure of the road to Long Lake will deny access to all but the most physically able. BLM should allow supervised primitive camping at the site particularly in the summer, and allow guides and packers, including Native American guides and packers if they are interested, to offer tours to the sites in the Long Lake region.

It is right to be sensitive to the concerns of the tribes regarding these sites. (I am part Cherokee myself.) However, the sites are a common cultural heritage that should be accessible to all Americans.

Recommendation: Because of the extremely high quality and quantity of rock art in the High Lakes area and because of the wildlife, scenic and other values; the area should be proposed as a National Monument. Improved supervision, education and structured access should be the management goal. Such an

2-2

2-2: We do not believe that the vandalism aspect is overstated. Vandalism occurs whether sites have well-developed access or are accessible only on foot. We have noted and documented vandalism that has occurred in just the past few years, well after the BLM was created. The "devil worship" data was in error and has been corrected. We have had several instances of "New Age" use of sites in the area. We do know that commercial use of sites is taking place. Archaeologists do not "dig" rock art—it is on rock and not subject to excavation. It is the responsibility of the BLM to ensure that Native American religious practices and sites are not unduly impacted by other activities. This same responsibility extends to any site which has religious or cultural importance to any recognized group of people.

2-3

2-3: The BLM does not propose national monuments; they are proposed by the National Park Service or by Executive order as a result of public demand and/or National Park Service studies. We do plan to have a monitoring, education, and access plan for rock art sites in the resource area. This plan will be developed in cooperation with Native Americans. We have plans for a group of sites which will be specifically open for commercial tours. Even though some visitors may vandalize sites, the public has the right to find and visit rock art sites on their own if they wish to do so.

approach would improve understanding of Native culture, promote protection of rock art and provide economic opportunity for Lake County and the tribes.

Management of Native Trout Fisheries in Deep Creek and the Chewaucan River

The preferred alternative appears to be correct in placing an emphasis on native trout and stream-bank improvement. However, the economic and recreational benefits to Lake County would be significant if these two streams were fully restored and managed as a catch-and-release native trout fishery. Both of these streams have world class potential, and, in fact, some 50 years ago were excellent fly fishing streams. However, unprecedented cooperation will be required between the BLM, Forest Service, conservation groups, ranchers and the general public.

2-4 | **Recommendation: Form an action group including ranchers, conservation groups, BLM, Forest Service, the general public and the Lake County Chamber of Commerce to fully restore these streams and to manage them as catch and release native trout fisheries.**

Shirk Ranch

The Shirk Ranch represents a unique and exemplary remnant of our ranching heritage. The property has the potential to be restored and developed to support educational programs because of the location in the middle of vast wildlife habitat and because of proximity to a plethora of rock art sites.

2-5 | **Recommendation: The preferred alternative should include the complete restoration of the Shirk Ranch and nearby wetlands in cooperation with a potential foundation that may be formed with that objective in mind.**

2-4: There are currently watershed councils in both the Chewaucan River and Deep Creek systems. The Chewaucan Watershed Council has been very active in river restoration programs and has made significant progress in improving fish habitat. The BLM has a minor portion of this watershed, and while we participate on the council, we do not play a major role.

The Deep Creek Watershed Council has been in place for several years but has not been active recently. The BLM has been a member of the Deep Creek Council and will continue to participate as activities occur.

ODFW regulates season and bag limits for angling, which determines how the fishery in Deep Creek and the Chewaucan River is managed. They also allow public comment on their proposed regulations, a process in which the BLM has participated.

2-5: Alternatives B and C propose complete restoration of Shirk Ranch. The Proposed RMP calls for at least stabilization of the ranch and restoration if funding is available. We are currently working with an individual who wants to form a group called Friends of Shirk Ranch; this may be of future interest to the commentor.

Colvin Lake and Colvin Timbers

It is not clear from the map in the EIS whether Colvin Lake and Colvin Timbers are included in the Abert Rim ACEC. Also, there may be some private property involved. Colvin Timbers represents a fine example of a unique Ponderosa Pine forest small in size and isolated where one would not expect such a forest. In other words, it is comparable to the Lost Forest only on a smaller scale. Colvin Lake is a unique body of water because of the sheepherders' camps that were there, the petroglyphs and the wildlife habitat.

2-6

Recommendation: If not included in the Abert Rim ACEC, Colvin Lakes and Colvin Timbers should be included. If private lands are involved in these areas, land exchanges or purchases should be arranged.

Please accept these comments and recommendations for the official record.

Yours truly,

Melvin R. Adams

Melvin R. Adams

cc. Oregon Natural Desert Association
The Nature Conservancy—Oregon Office
Darrell Seven—Summer Lake Inn
Lake County Chamber of Commerce

2-6: Colvin Timbers is included within the Abert Rim addition to the ACEC. We have stated that we will acquire desired private lands, primarily those in ACEC's and WSA's, if possible, but only from willing sellers. The boundaries of the Abert Rim ACEC were selected based on areas that could be defined and managed while including the Native American values identified as important in consultation with the Tribes. This does not mean that there are not other significant values worthy of protection which may not be included in this ACEC. These areas may be managed and protected by other means.

November 8, 2001

Mr. Dwayne Sykes
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

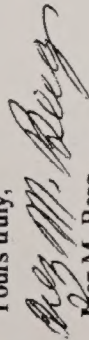
Dear Mr. Sykes:

Thank you for sending the Draft Lakeview Resource Management Plan/Environmental Impact Statement. I found it very interesting.

I would again express my hope that the Public Sunstone Area will remain open to the public. Rockhounds generally try to take out more trash than they bring in. They patronize the merchants in Lakeview (gas stations, motels and restaurants). Rock and gem clubs have annual trips to collect agates in the Warner Mountains, sunstones at Plush, as well as stopping for obsidian at various sites.

Thank you again for sending the information. I will share it with several rock clubs in this area.

Yours truly,



Mez M. Berg
PO Box 537
Wheatland, CA 95692



Byron Rendar
<brendar@pcc.edu>
11/19/01 03:12 PM

To: d1sykes@ar.blm.gov
cc:
Subject: Lakeview Draft RMP/EIS

Hi,

I'm using email to write you because I'm not sure if regular mail is getting through or is being delayed.

I attended a meeting in Portland some time ago about ORV use on BLM land. It seemed that the use of ORVs has exploded in the past several years along with damage to the land. The BLM representatives acknowledged this and also said that they had not paid attention to the increased use and damage.

So I am wondering why Alternative C, at least in regard to ORV use, is not the Preferred Alternative. I think this would be a wonderful opportunity to see how long it takes for land to recover from ORV use - is it years, decades, generations?

Has BLM done any economic impact studies on ORV damage and use? Or is this is a case where fees can act as blood money for irreparable harm.

Sincerely,

Byron Rendar
3586 NE Stanton
Portland, OR 97212

4-1: As specified by 43 CFR 8340 and BLM planning guidance, the Draft RMP/EIS examined a full range of alternatives. This included a range of OHV designations including open, limited to existing roads and trails, limited to designated roads and trails, and closed. In the Human Uses and Values section, the effects of each alternative on OHV opportunities were examined and potential trends in visitor use levels were identified. No economic impact studies on OHV damage or use were conducted as part of the Draft RMP/EIS. Instead, the impacts of each OHV alternative were discussed for each resource or program using measures/parameters suitable for each individual resource.

Fees for OHV use are collected by the State of Oregon through State all-terrain vehicle permits. BLM can apply to receive a portion of these fees to support specific all-terrain vehicle management activities throughout the State.



"Joe LaVallee"
<lavallee@teleport.com>
11/19/01 04:55 PM

To: <d1sykes@or.blm.gov>
cc:
Subject: Government land

5-1

i feel that the government has to much land and that it should open the land up for homestead. sell it to the people and let it get on the tax rolls, make it pay off instead of costing the taxpayers. just like they did in s.w.Idaho, it is called magic valley. that is what i think should be done with it. Joe LaVallee in Oregon.

5-1: With the exception of Desert Land Entries, all of the homestead laws in the lower contiguous 48 states were repealed with the passage of FLPMA (October 21, 1976). Reinstating these laws would require congressional action. Regarding the sale of public land, the specific parcels of land included in the RMP Land Tenure Zone 3 (see Appendix O2) are identified for future disposal/sale consideration.



"Scott Erickson"
<dancingscott@hotmail.co
m>

11/20/01 01:18 PM

To: d1sykes@or.blm.gov
cc:
Subject: Draft Lakeview RMP EIS

I'm writing to state my opinion on the Draft Lakeview RMP/EIS, concerning ORV use in cross-country environments. I absolutely support Alternative C, the ZERC option. I feel that ORV use is disruptive enough as it is in designated areas, where the noise travels much farther than the designated boundaries (and which they often fail to remain within, anyway). I am a freelance writer and photographer currently working on a book about the Oregon High Desert, and am dismayed by the amount of damage I have discovered as a result of irresponsible ORV use.

Sincerely,
Scott Erickson

Get your FREE download of MSN Explorer at <http://explorer.msn.com/intl.asp>



"S. Gertsch/R. Moore"
<aloha@verizon.net>
11/22/01 03:24 PM

To: d'sykes@or.blm.gov
cc:
Subject: Draft Lakeview RMP/EIS

I support Alternative "C" of the Draft Lakeview RMP/EIS since this alternative would prohibit any ORV use in the area. I urge you to choose at least the part of Alternative "C" that prohibits ORV use. ORVs cause major damage to ecosystems. Ecosystems are valuable to humans and valuable in their own right.

I do not want a copy of the Draft Lakeview RMP/EIS.

Steve Gertsch



"Powers, Patrick (EIP)"
<ppowers@electrogias.com>

To: "d1sykes@or.blm.gov" <d1sykes@or.blm.gov>
cc:
Subject: Draft Lakeview RMP/EIS

11/28/01 03:26 PM

Please choose Alternative C, for no offroad vehicle use.

Thank you
Patrick M. Powers
Corvallis, OR



"Pete Clyne"
<pclyne@uswest.net>
11/23/01 07:16 PM
To: d'sytes@ar.blm.gov
cc:
Subject: Dune Comments

Hi Dwayne,

I'm a resident of the great state of Minnesota. However, a few times a year I make the trip out to Oregon with my ATV's for some great riding. I would be most disheartened if more of Oregon's beautiful dunes were closed to ATV's, as it is a great way to view them. I also think it would be detrimental to the area's economy, as ATVers provide a lot of financial backing for the businesses in the general area.

The recent trend of all these closures disturbs me greatly, as it seems that as a public, we are losing our ability to enjoy the great outdoors, and this is why I am writing this email, to urge you to not take any more of it away from us.

Thank you for listening.

Sincerely,
Peter Clyne



"Lewis Malotte"
<lewm@otn.net>
11/28/01 07:49 PM

To: <lsykes@oj.blm.gov>
cc: <jaybo@sandbros.com>
Subject: sand dune closure

10-1

I live in Northern California and have been to the Christmas Valley Sand Dunes at least 10 times since 1987 on various weekends and holidays. Is it true that the complete sand dunes are going to be closed? and if so why? Doesn't the "M" in BLM mean management? I don't see any management here with completely closing them off. If the concern is the area around Fossil Lake and intrusion maybe there needs to be a better fencing and warning system to stay out of there. When we go up there we have at times stayed in the Desert Inn and the other hotel in Christmas Valley as well as dining at the Lodge and the other restaurant. Isn't this going to hurt the economy up there? What has happened to public lands in the USA. The government is moving rather quickly in the last few years to just close us TAXPAYERS out of the land we pay you to manage. I have in the past considered buying some land in that area. Its nice to get away from it all up there. I would then be an Oregon taxpayer too. But if they close the dunes and other areas then wouldn't that lessen the value of being there to myself?. Off road vehicle use is a good family activity that the government is trying to discourage at a time when family activities that keep children talking to their parents is considered good. Such as the new phase of anti drug commercials they are playing now. "Offroading-the Anti Drug". I am also considering being at the Dec 5 meeting, which is and 8 hour drive. I guess I will bring my quad. Thank you for your time.

Lewis Malotte
1917 Park Circle
Marysville, Ca 95901

10-2

10-1: The Sand Dunes WSA will not be closed to OHV's. Currently, about 11,453 acres within the Sand Dunes WSA are open to OHV use. The existing vehicle closure on Fossil Lake would be expanded by approximately 2,328 acres to provide protection for paleontological and archaeological resources. The expanded closure, which would primarily include deflation areas where the fossils are exposed, lies to the north and east of the existing Fossil Lake vehicle closure area, and would decrease the area of the dunes open to OHV's to approximately 9,125 acres (refer to Table 3-3 and Map SMA-9a). When laying out the boundary for the addition to the Fossil Lake Vehicle Closure Area, the BLM tried to keep as many of the large, continuous dunes in the open area as possible.

10-2: Under Alternatives C and E, the Sand Dunes would be closed to OHV use. Impacts of this closure are discussed, including displacing current visitation of approximately 11,000 and the estimated loss of \$263,000 in local and regional spending. The text for Alternative E has been edited to clarify this impact.



"berglundbradley"
<berglundbradley@hotmail.com>

To: <d1sykes@or.blm.gov>
cc:
Subject: Eastern Oregon Public Lands

11/29/01 08:40 AM

Mr. Dwayne Sykes,

I have read over your draft plan regarding the proposed changes in the Eastern Oregon public lands. I am concerned about the plan to eliminate ORV's from the "sand dune" area.

11-1: Please see response to comment 10-1.

11-1

"Use of ORVs in the Sand Dunes would be closed and in other areas it would be limited to designated trails and roads. "

Designated trails and roads are fine in some locations but to eliminate ORV's from the sand dune area is ridiculous. As you know the sand dunes are effected by winds, thus being rebuilt on natures own after a day of use. This is one of the draws of ORV users. I feel if you eliminate the use of ORV's in this area you will greatly reduce the number of users and subsequently hurt the local economy. I feel the local economy completely depends on the "ORV crowd" on busy weekends to make the \$ needed to support itself. Please do further research before you turn these local areas into "ghost towns".

"Responsible ORVer"
Bradley D Berglund
PO Box 192
Poy Sippi, WI 54967

Dwaine Sykes
SCLM.
Lakeview DR

keep the ORUs out of fragile
desert areas. support Alternative C
with ~~zero~~ acreage. ORUs
have already wrecked too many
areas.

Alan Carlton
2208 Pacific Ave
Oakland

Dwayne Sykes
RMP Team Leader

Bureau of Land Management
HC10 Box 337
Lakeview Oregon 97630

Merlin V. Kost
635 SW 19th #215
Portland, Oregon,
97205-1617

December 1, 2001
RECEIVED
DEC 03 2001
LAKEVIEW, BLM.

Dear Mr. Sykes

I want to thank the Lakeview BLM
office for sending me the Resource
management Plan Catalog.

In regards to Wild Horses,
I read and studied Table 2-32 in
Volume 1, I like the characteristic
representative herd goals for the
Bailey Desert herd and the Besty Butte
wild horse herd, I totally support these
goals. It would be wonderful if some
out of state Spanish Mustang blood were
introduced into Besty Butte,

the Spanish horse strains I have
in mind are the Blue Roan and Dun
horses at Montezuma Canyon mountain herd,
the Red Dun, brules and Red brown
horses at the Subgus Springs herd in Utah,

13-1

13-1: Priority would be to enhance or perpetuate the special or rare and unique characteristics already present in each herd management area and representative of the historic backgrounds of those herds. However, policy does not preclude introduction of horses from out of Oregon.

Reg² and the Spanish Cerbat Mountain horses of northern Arizona managed by the Kingman Arizona BLM office.

I would love to see all three of the above Spanish mustang strains transplanted to Betty Butte.

I would also like it if more

King horses of quality were transplanted from the King horse herd to Betty Butte in the year 2002.

The King Mountain herd has real dark soragova Blue Roan horses.

It would be nice if some Blue Roan horses from the King herd could be sent to Betty Butte near a different waterhole

from where King horses are sent. These Spanish mustang strains should create strong Spanish characteristics at Betty Butte when they mix breed with

Part 3. the other horses. In many of the mix bred foals the Spanish horse characteristic would dominate. I like the Lebanon office herd management goals for the Betty Butter herd. The Spanish horse characteristic and dorsal stripes on the Betty Butter herd goals are noble goals.

Round cannon bones and small hind feet should also be Betty Butter herd goals. I hope the Lebanon office tries to select away from Chrome markings on the Betty Butter horses as the year progresses.

I like your wild horse specialist, she is a nice woman.

Best wishes and regards for the Lebanon District wild horse program.

Sincerely Melvin V. Kost

cc To: SCOTT FLORENCE - Area Manager

P.S. Gray color genes will saturate the whole herd over time. Two: color horse numbers should be kept low at Betty Butter.

November 29, 2001

~~FAX to~~

RECEIVED
DEC 04 2001
LAKEVIEW, B.L.M.

Dwayne Sykes, RMP Team Leader

BLM

HC 10 Box 337

Lakeview OR 97630

Thanks for the well organized, easy to read Lakeview RMP

We support Alternative C.

Its emphasis is on protection of natural values, while still permitting, on our public lands, many uses which do degrade, in one way or another, the land's natural character. These uses, although in our view undesirable, are necessary at present, to accomodate the real needs of those whose living depends on cattle grazing and mining.

Very high priority should be placed on implementing better practices on these lands, especially in riparian areas, on monitoring and controlling mining activities and consolidating and acquiring land with high public resource values. Also, monitoring and controlling OHV use is essential.

Sincerely,

Myra & Alan Erwin

Myra and Alan Erwin
300 Grandview Drive
Ashland, OR 97520



ALSANDINE@aol.com
12/04/01 02:18 PM

To: d1sykes@or.blm.gov
CC:
Subject: Lakeview Resource Area Management Plan

Dwayne Sykes
RMP Team Leader

Dear Mr. Sykes:

I urge you to limit destructive off-road vehicle use of the Lakeview Resource Area by choosing Alternative C. I camp in the area nearly every year, and I have seen the harm done by ORVs.

Thank you for your consideration.

Cordially,
Al Sandline
383 Coventry Rd.
Kensington, CA 94707

December 4, 2001

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

Dear Mr Sykes:

I would like to make comments on the Draft lakeview Resource Area Mgmt Plan.

I understand that the draft plan would limit ORV use (in Alternative C) especially in the Sand Dunes and Lost Forest ACECs. Given that this would help control ORVs on BLM land, I urge that this be adopted. These vehicles do a lot of long-lasting damage to ecosystems and need to be controlled. Other areas are open to their use.

Also in Plan C are recommendations for Wild and Scenic River status for three streams, and management for those values until legislation designates them; closing 500 miles of roads in Special Management Areas (WSAs, ACECs, and Wild and Scenic River corridors) closing all roads in riparian areas; eliminating or reducing grazing from riparian areas; all of which I support.

I urge elimination of mineral & energy extraction or alternatively, close a high percentage of the area to mining.

I urge addition of the identified 1,194 acres to existing Wilderness Study Areas.

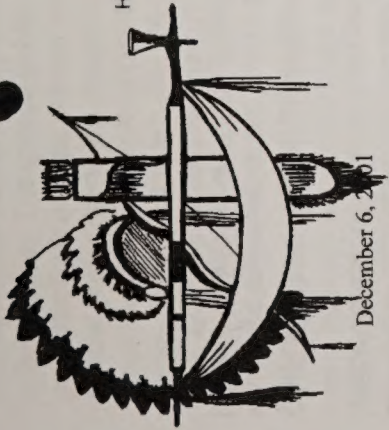
I urge elimination or limitation of Special Recreation Permits, in order to protect natural resource values.

I understand that Alternative D is BLM's preferred alternative. However, I urge that the above components be adopted into whichever plan is chosen.

Sincerely,

Margaret Stephens

Margaret Stephens
1830 23rd Street NE
Salem, OR 97303



Burns Paiute Tribe

HC-71 100 PASIGO STREET
PHONE (541) 573-2088
FAX (541) 573-2323
BURNS, OREGON 97720

December 6, 2001

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

RECEIVED

DEC 10 2001

LAKEVIEW, B.L.M.

Mr. Sykes:

Thank you for sending an additional copy of the Draft Lakeview Resource Management Plan/Environmental Impact Statement. I have read the document and have a number of comments to provide you in relation to how the proposed actions may impact the Burns Paiute Tribe. The Tribe has provided both oral and written comments during numerous meetings about the Lakeview BLM area. The area managed by your agency is of great importance to the Tribe. Tribal members actively travel to the area to hunt, fish, gather and practice their religion. There is still a rich oral history about this area and elders frequently relay this information to younger tribal members, tribal staff and other individuals.

There is concern about the impact of recreational activities on cultural resources. On page 1-5 this issue is discussed without a mention to the possible damage of cultural resources by recreationists. Lakeview BLM needs to make every effort to reduce the impacts of recreationists of all types. This also includes the use of tribal religious sites, rock art, plant sites and other cultural resources by other religions. I have been made aware and have seen a number of cultural sites that have been defaced. These activities are very disturbing and more protection needs to be given to these cultural sites.

Page 1-6 presents the issue of Native American tribal interests on Lakeview BLM managed land. This is a complicated issue. It is my suggestion that your agency continue to have regular contact with the Tribal Council and with staff. Staff play an important role because they convey their information to Tribal Council. The Tribe has developed a valuable relationship with your archaeologist and botanist. Both staff have made every effort to discuss the issues of Lakeview BLM projects to Tribal Council, staff, and tribal members in a clear and concise manner. This is important because of the

17-1 | 17-1: Protection of cultural resources has been added to the description of the issue.

high volume of information provided to the Tribe on a daily basis. Lakeview BLM needs to remember that the Tribe has a small land base and must rely on public land resources for their needs. Continued access to public land is necessary for the continuance of tribal culture.

Riparian vegetation, as discussed on page 2-8 is important to tribal culture. This vegetation is used during a variety of activities and needs to be maintained and improved on the Lakeview Resource Area (LRA). Native vegetation was and is used by tribal members throughout the year. Page 2-14 presents the issue of noxious weeds. Noxious weed eradication methods are of concern to the Tribe. The use of poisons may kill native cultural plants along with the weeds. This is not a suitable solution to the problem of noxious weeds. Spraying poison may also get on cultural plants that are later used by tribal members for traditional activities. There is a concern that the poison may be transmitted to tribal members during these activities. Traditional basketry activities often require the person to put plant material in their mouths and in turn the poison. Direct coordination with the Tribe is necessary when any poisons are used in the LRA. Detailed maps need to be provided to the Tribe so that tribal members can be notified where and when spraying is going to occur.

Tribal members actively fish in the LRA. On page 2-3 the management activities in riparian areas are discussed. LRA management of fisheries should be coordinated with the Tribe by contacting Tribal Council and staff. Staff contacts should be both the cultural and fish/wildlife departments. The Tribe has a long tradition of fishing and will continue their activities on the LRA.

Livestock grazing in areas that contain traditional cultural plants needs to be coordinated with the Tribe. Spring grazing in areas that contain root crops and other cultural plants should be carefully managed. Tribal members are interested in continuing to gather traditional plants in the LRA.

ACEC designations are presented on page 2-53. The Tribe is in support of all of the proposed ACEC designations and have conveyed this information at Tribal Council meetings, Elders meetings and staff contact. Connley Hills RNA is culturally important to the Tribe for a variety of reasons, including plants and archaeology. Mining activities need to be withdrawn from sites that contain archaeological/cultural sites. The High Lakes area is of extreme importance to the Tribe and every effort needs to be made to protect the cultural values. The same protection needs to be provided to the Fish Creek Rim, Rahilly-Gravelly, Foley Lake, Juniper Mountain, Table Rock, Black Hills, Red Knoll, Abert Rim and Spanish Lake areas. Table Rock has significant cultural values and mining should be withdrawn. Mining also needs to be withdrawn from the Red Knoll area due to significant cultural and plant resources. The LRA is encouraged to use the largest number of acres in designating the ACEC's as discussed in alternative C.

On page 2-57 a concern about the "degradation and inappropriate use of cultural features which are important to the Native Peoples of the area could occur if these features become widely known". This concern cannot be stressed enough. Tribal members and

17-2

17-2: The BLM agrees that riparian vegetation is important to Tribal culture (see discussion on page 2-59 and Table 2-37 of the Draft RMP/EIS). One of the values for the proposed designation of Guano Creek as an ACEC/RNA is the riparian zone, which includes camas, yampa, and willows.

Every attempt is made to avoid applying herbicides to cultural plants. Botanical and archeological clearances are performed on each weed site before they are treated. There are strict guidelines given to contractors and agency applicators regarding the avoidance of impacts to nontarget species. On 90 percent of known weed sites under herbicide treatment, applications are made by hand with backpack sprayers or wicks which wipe the herbicide on the individual target plants.

The LRA weed specialist is willing to meet with the Tribe to describe the weed treatment program at the Tribe's request.

17-4

17-3: In general, any fisheries management that may involve ground-disturbing project work would require preparation of a NEPA document. Affected Tribes would be consulted during that process. While the BLM may conduct some fish inventories, the agency does not manage the fish populations. Specific species populations are managed by the ODFW, which sets bag limits, seasons, and other restrictions. We will continue to work with and invite the active participation of Tribal representatives on fish habitat issues on BLM-administered land.

17-5

17-4: In proposing the ACEC's that contain areas of traditional cultural use, the BLM verified that most of those areas were not used for spring livestock grazing. Also, there is the caveat in Alternative D related to grazing impacts on ACEC values, which would include cultural plants. This indicates that monitoring would take place on a regular basis to determine if adverse impacts are occurring, then appropriate management action would be implemented.

17-5: Areas of moderate mineral potential within Red Knoll ACEC are recommended for mineral withdrawal under Alternative D. The BLM can only recommend a withdrawal; it must be approved by the Secretary of Interior. Any proposed withdrawal of 5,000 acres or more must be approved by Congress. Areas with low or no mineral potential have traditionally not been recommended for withdrawal because there is no perceived need. All ACEC's will have a monitoring plan (see Appendix R) dealing with protection of the cultural values.

staff have been shocked by some of the damage to cultural sites on the LRA. This needs to be stopped. The general public must be informed about how their actions are permanently impacting cultural sites. Sites locations should not be divulged to the general public due to the danger of looting and other inappropriate activities. Picture Rock Pass is an example of how the public has impacted a cultural site. Vandalism and looting is rampant at this site. New-age rock art must not be placed on Native American rock art. This vandalism destroys the cultural beauty of the site, insults tribal values and is illegal. Every effort must be made to protect this site from destructive activities.

The Burns Paiute Tribe may not have a ratified treaty as discussed on page 2-64, but they are a federally recognized Tribe in the United States and consider the LRA part of the traditional use area.

I am concerned about how fire management is discussed in relation to cultural resources. It is my understanding through discussions with LRA staff that the fire and archeology staff closely coordinate during prescribed burns and wildfires. This is not apparent in this draft document. Additional language needs to be included about how your fire shop coordinates with archaeology along with how the fire areas are rehabilitated. A possible location for the additional language is on page 2-77 in the discussion of "Impacts of Suppression Activities on Resources".

The Tribe recognizes that by federal law the LRA is open to mineral exploration as discussed on page 2-87. Despite this law, the Lakeview BLM can use nondiscretionary closures and have land withdrawn from mineral entry. Lakeview BLM needs to withdraw areas of great cultural significance from mineral entry. Past mineral activities have impacted cultural sites to the dismay of tribal members and staff. Lakeview BLM also has to follow federal laws regarding cultural/archaeological resources and these laws need to be followed with the same vigilance given the mining laws. The LRA has extremely qualified archaeological and botany staff that are nationally recognized for their experience and knowledge. There are also a number of Tribes, including the Burns Paiute, that consider the LRA of great importance. Tribal concerns regarding the impact of mining must also be considered. Cultural sites cannot be replaced once damaged.

On page 3-1 there is a discussion about project goals. Additional language on sensitive communities needs to be included. Culturally sensitive plants also need to be managed.

Plan amendments are presented on page 3-5. The Tribe needs to be contacted about plan amendments before the general public.

On page 3-11 a brief description of the preferred alternative is presented. There is no mention of cultural values in this paragraph and is should be included. LRA has a high concentration of cultural sites and these values must be included in management goals. On page 3-13 it is indicated that "nonnative plant species may also be used". This should be minimized because the focus should be on native plant species. Native plants species are important to the Tribe for food and art resources.

Regardless of the alternative or parts of alternatives selected as the Proposed Plan, management actions under that plan will abide by the Stipulations for Mineral Operations in Appendix N3, pages A-308 to A-316 in the Draft RMP/EIS. Also see the descriptions for mineral management for each ACEC/RNA in the Special Management Areas section of Chapter 3.

17-6: Public education programs are planned. Site locations generally are not given out and are not subject to "Freedom of Information Act" requests. However, some sites are well-known and books giving their locations have been published. One purpose of the ACEC proposals is to provide special management for these areas that are already well-known to the public. Picture Rock Pass is one of the well-known sites which will be included in a public education and interpretation plan. However, it was not deemed suitable for an ACEC, and is currently a NRHP site.

17-7: Information regarding coordination of fire use and cultural resources and consultation with Tribes has been added to the text appropriately.

Your understanding that fire management and archaeology staff closely coordinate during prescribed fires and wildland fires is correct. Any treatments (prescribed fire) are planned by an interdisciplinary team of resource specialists to assure that all possible effects, including archaeology, are considered in project planning and implementation. Resource advisors are assigned to those wildfires that have immediate potential to significantly enlarge and have additional fire suppression resources assigned. The revised fire management plan (currently scheduled for completion in fiscal year 2003) is where the use of wildland fire resource advisors will be discussed in more detail. An interdisciplinary team will be utilized in the fire management plan revision.

17-8: In the Red Knoll ACEC, where significant cultural resources are present within an area which has the potential for mining, mineral withdrawal was recommended in the preferred alternative. While it is possible that mining could occur in the other areas of cultural significance, it is not likely due to the low potential for occurrence of minerals over most of the resource area. Since mineral potential is a factor considered in determining whether an area should be proposed for withdrawal, other areas have not been recommended for withdrawal. See also comment response 17-5.

17-9: The discussion at the beginning of Chapter 3 deals with the broad management goals of the RMP. Sensitive communities or cultural plants are not mentioned since these goals are not that specific. However, the goal statements dealing with long-term viability of natural ecosystems, management of sensitive plants and communities, and meeting treaty and trust responsibilities include these areas of concern and are specifically addressed in the management actions prescribed later in Chapter 3.

- 17-13

Management Goal 2 focuses on western juniper and quaking aspen. Both plants are cultural important to the Tribe for food and non-food activities. Large scale cutting of juniper can be distressing to tribal members. Every effort should be made to keep the Tribe informed about juniper cutting projects. The most up-to-date biological information should also be used in the determination of juniper cutting units. Quaking aspen is still used by tribal members and needs to be protected.
- 17-14

The Management Goal to “increase the public’s knowledge of, appreciation for, and sensitivity to cultural resources, Native American issues, and paleontological resources” is important. I would discourage on-site interpretation, except in areas that can be easily managed or protected. The Tribe should be involved from the beginning of any project that proposes either off or on-site interpretation.
- 17-15

The Management Goal to “manage public lands to provide social and economic benefits to local residents, businesses, visitors and future generations” also should include Tribes as part of the list.
- 17-16

Management Goal 1 under Fire Management on page 3-28 indicates that “safety, environmental, social, economic, political, and resource management objectives will be considered”. Cultural objectives are not part of the list and need to be included. The same would apply to Management Goal 2 and 3 under Fire Management on pages 3-28 and 3-29.
- 17-17

On page 3-33 Visual Resources are presented. It is important that the LRA remember that visual resources can also be cultural resources. Areas with religious values tend to be the most scenic areas of the LRA and need to be protected from permanent damage.
- 17-17

The Lands and Realty Management Goal 1 needs to include language that makes LRA land available for exchange, lease or sale to the Tribe. “Tribe” is not included in the list on page 3-35.
- 17-17

On page 3-47 and 3-48 the LRA needs to use the best known science in the management of western juniper woodlands.
- 17-18

On page 3-70 under Alternative D the language “while maintaining resource values for multiple use and sustainability” is too general. It is unclear whether cultural and other values are included or if the purpose of this sentence relates to agricultural multiple uses.
- 17-19

In the Cultural and Paleontological Resource discussion starting on page 3-98 it is unclear on the number of sites placed in the four categories listed on page 3-99. How many sites are in conservation for future use, public use, experimental use and discharged? Also what form will the public education take in dispersing knowledge about cultural resources? Has the LRA been doing public education concerning cultural resources? Are cultural staff given adequate time to do educational activities with the public?
- 17-10

Through the government-to-government coordination process, the resource area makes every effort to meet with the Tribes and keep them informed on all major planning projects, including plan amendments or revisions. This is done as early in the process as possible so that Tribes are aware from the beginning.
- 17-11

Protection of cultural resources has been added to the description of Alternative C and Alternative D, the preferred alternative.
- 17-12

At present, the LRA is preparing a long-term strategy and plan to develop native seed sources for use in replanting and reclamation of disturbed areas. Few seed sources exist that are locally adapted, and often only nonnative plant species are available for emergency rehabilitation. This year, we will begin the process of gathering seeds to be grown and developed into the production of seed sources for rehabilitation work. These collections are not limited to grasses only; culturally important plant seeds are also on that list. Consultation with the Tribes will continue to determine their priorities and interest in these projects.
- 17-13

In most areas, treatment of aspen would focus on removing invasive juniper, resulting in healthier aspen stands, which would benefit the Tribe.
- 17-14

As shown under the Alternatives A–D section, when juniper projects are planned, Native American values or use would be evaluated. Affected Tribes would be contacted at an early stage of project planning. The size of any proposed treatment area would be discussed with the Tribes at that point, and Tribal concerns would be taken into account.
- 17-14

Based on the RMP and site needs, the District has plans for public interpretation and education. All materials, sites, interpretation etc., will be presented to the Tribes for consultation. It is expected that the Tribes will be active partners in the development of these sites and materials.
- 17-15

Tribes have been added to this management goal.
- 17-16

Cultural resource objectives have been added to the list, since we do consider them in these activities.
- 17-17

Management Goal 1 does not indicate or limit to whom lands would be disposed. Lands could be conveyed to the Tribes the same as for any other individual, group, government, etc. In fact, two parcels, one in Goose Lake Valley and one in south Warner Valley, are identified for disposal to the Tribes.
- 17-18

The paragraph under Alternative D was reworded to reflect your concern.

17-20 | It was my understanding the LRA staff have developed a system of contacting Tribes. On page 3-101 the impression is given that no process or procedure has been developed.

17-21 | Management Goal 4 on page 3-102 is important to the Tribe. Cultural plant resources need to be maintained and improved on the LRA. The LRA should not share tribal cultural plant information with any other person, agency or government. It is also important to "meet subsistence needs of Tribes and Tribal communities to the greatest extent practicable" (page 3-104).

17-22 | On page 3-109 under Management Goal 2 language needs to be included about the protection of cultural resources.

The Tribe is in support of the direct sale of 200 acres to Tribes for cultural purposes as discussed on page 3-130.

17-23 | Cultural plants need to be included with the discussion of special status plants on page 4-25. They also need to be included in the discussion of noxious weeds and competing undesirable vegetation starting on page 4-31.

It is also important to limit "land-disturbing activities within identified Native American religious sites or traditional cultural properties" as discussed on page 4-79.

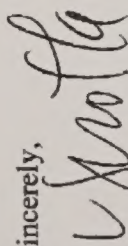
17-24 | On page 4-98 the proposed Table Rock ACEC needs to be given the highest protection from mineral entry due to the significant cultural values.

17-25 | Cultural resources should be protected from OHV use as discussed on page 4-126. Cultural sites should be closed to OHV use.

17-25 | On page A-8 the relationship between the LRA and Tribes is discussed. As mentioned earlier, the Tribe has ongoing and consistent contact between archaeology and botany. I would like to see more contact from the other specialists with the Tribe.

This is the bulk of my comments regarding the management plan. Please feel free to call me if you have any questions.

Sincerely,



Linda Jerofke
Burns Paiute Cultural Consultant
541-962-0434

ljerofke@eoni.com or
ljerofke@orednet.org

17-19: While these categories exist, none of the sites currently recorded (around 3,000) have been formally categorized. This work is proposed for the future in our database. Public education could take many forms and will be developed in consultation with the Tribes. We have conducted teacher workshops and developed the "Oregon Teachers Guide" for cultural resources. More time is expected to be devoted to educational activities in the future.

17-20: The text under the monitoring section on page 3-101 of the Draft RMP/EIS is not intended to imply that no process is currently in place for general Tribal contact. This process varies somewhat by Tribe. The BLM field staff and/or managers keep Tribal governments and members informed of all projects potentially affecting resources of interest through telephone calls, letters, informal meetings with Tribal staff, and attendance at Tribal meetings. Copies of NEPA documents are routinely provided to Tribal councils, staff, and members for those projects requiring the preparation of formal NEPA documents (environmental assessments and environmental impact statements). Copies of the annual "Lakeview Resource Area Planning Update" are also sent to the Tribal chairman, staff, and members. The requirements to formally consult with Tribes is also noted repeatedly in Chapter 3.

Rather, the text under this section of document was referring to the need to better *track* consultation specifically related to the implementation of management within the proposed ACEC's and traditional cultural properties that are of great Tribal interest.

17-21: Generic cultural resource information concerning plants used for food or fiber is shared with the general public for education in the protection of these plants. However, there is a concerted effort to protect the confidentiality of locations, the sustainability of those plant communities, and the access to those plants (see page 2-59 and 3-102-103 in the Draft RMP/EIS).

17-22: Special status plants or Bureau sensitive plants are legal terms and definitions pertaining to Oregon State land and the Federal "Endangered Species Act." Cultural plants, unless they are specifically on State of Oregon or BLM lists, are not treated as special status plants. However, under the concept of trust responsibilities to the Tribes, protection of cultural plants and plant communities are considered in this RMP and during project planning/NEPA process. Also refer to comment response 17-2.

17-23: Please see response to comment 17-5.

17-24: Specific closures of areas and roads were developed to protect resources from OHV activity. If additional areas are found in the future, modification of the RMP or simple closure under other authorities are possible. If the Tribes have specific proposals, these should be presented to the BLM.

Many of the changes in the OHV designations and proposed road closures within the LRA have been driven by the need to protect cultural resources. The basis for 8 of 12 proposed ACEC's relate to the existence of cultural resources that meet the threshold for the relevance and importance criteria in the evaluation process. Additional protection is afforded to cultural resources through a myriad of laws such as the "Antiquities Act" of 1906, the "Archaeological Resources Protection Act," FLPMA, and others.

17-25: Please see response to comment 17-20.

RECEIVED
DEC 17 2001
LAKEVIEW, B.L.M.

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

December 9, 2001

Dear Mr. Sykes,

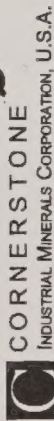
I am writing to register my strong support of Alternative C for the Draft Lakeview Resource Area Management Plan [RMP/EIS] because this alternative does the following:

- Limits Off Road Vehicle [ORV] use across the entire Lakeview Resource Area.
- Excludes ORVs from the Sand Dunes and Lost Forest Area of Critical Environmental Concern [ACEC] where they currently are wreaking havoc. The Sand Dunes is also a Wilderness Study Area [WSA].
- Recommends Wild and Scenic River [WSR] status for three streams, and manages for those values until legislation designates them as WSRs.
- Closes 500 miles of roads in Special Management Areas [WSAs, ACECs, and WSRs] and closes all roads in riparian areas.
- Adds 1194 acres to existing WSAs.
- Adds 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- Reduces grazing by 20% overall and excludes grazing from riparian areas.
- Closes a high percentage of the area to energy and mineral extraction.
- Limits the issuance of Special Recreation Permits to protect natural resource values.

Thank you for registering my comments in support of Alternative C.

Walt Mintkeski

Walt Mintkeski
6815 SE 31st Ave
Portland, OR 97202
503-771-0232 (H) 503-653-1653 (O)



RECEIVED
DEC 17 2001

RECEIVED
DEC 17 2001

12/14/01

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10, Box 337
Lakeview, Oregon 97630

RE: Draft Lakeview Resource Management Plan Environmental Impact Statement

Dear Mr. Sykes:

Cornerstone industrial minerals has reviewed the Draft Lakeview Resource Management Plan Environmental Impact Statement (DEIS) and offers the following comments and observations:

GENERAL COMMENTS

Upon review of the DEIS it is Cornerstone's recommendation that Alternative B or a slightly modified Alternative D will incorporate the best management practices that balance and protect all major ecological and socioeconomic concerns.

SPECIFIC COMMENTS

Appendix N2, Mineral Development Scenarios - Locatable Mineral Resources:

Future Trends and Assumptions: Based on the present market conditions and the demand for the high quality perlite found in the Tucker Hill area, Cornerstone expects to continued exploration, resource definition, rock testing, and expand the mineral extractive activities.

Perlite and Diatomite: The second paragraph should be modified to reflect the current and future projections for the perlite industry and unique perlite found in the area. "For the purpose of land use planning, it is anticipated that the existing mine would expand beyond the scope of the current plan of operations through expansion of existing operations and additional development within the claim block."

Cultural and Paleontological Resources:

On page 2-58, second column the reference area shown on Maps SMA-3 and -4 refer to the Red Knolls proposed area not Tucker Hill. The section needs to be relabeled or the maps need clarification.

The following specific comments are directed if Alternative D is adopted.

Roads and Transportation:

The proposed closure of approximately 372 miles of road would unduly restrict the public's access for recreation and hunting, ranchers for livestock management, and mineral exploration. If a road closure

P.O. Box 1287 • HC 64 Box 19 • Lakeview, OR 97630 • (541) 947-5755 • Fax (541) 947-5770 • www.cornerstonemineral.com

19-1

19-1: The additional information has been added to the Appendix N2.

19-2

19-2: The additional information has been added to the Appendix N2.

19-3

19-3: The reference in the text to Maps SMA-3 and SMA-4 has been dropped.

19-4

19-4: Under the preferred alternative, about 535 miles of roads would be closed. However, this would include roads that would be closed seasonally (288 miles) from December 1 to March 1 to protect deer winter range and to prevent harassment to winter herds, as well as roads that would be closed permanently (247 miles). These proposed closures include 354 miles of road that are currently closed under existing management (see Table 4-4 and Maps SMA-5 through SMA-31). Virtually all of the proposed permanent closures are in existing WSA's or proposed ACEC's. These closures will not preclude access to any general area as alternate access is still provided. When compared to the estimated total of over 5,000 miles of existing roads and ways (trails) in the resource area, the additional closure of roads, seasonally or permanently, should not have a significant impact on access in most of the area.

L-19

policy closer to Alternative B is not selected, then a more critical look at the roads with additional input from the public is warranted.

Red Knoll Potential ACEC:

The northern portion of the proposed ACEC shows moderate potential for perlite and Sec. 18 of T35N, R20E for base and precious metals and should not be considered for mineral withdrawal and or inclusion in the ACEC boundaries. Little exploration work has been done on the area to determine the quantity and quality of perlite and changes in the mining laws (assessment costs changed to \$100/annual claim fee) have discouraged the holding of locatable industrial minerals ground on the periphery of existing operations until possible future needs.

Under current regulations regarding future mineral exploration activities in the area, additional sage grouse and cultural sensitivity constraints would be included. The southern portion of the potential ACEC if designated would not need additional mineral withdrawal because an area designated an ACEC as stated in BLM Management manual 1613 "must require special management attention to protect the important and relevant values". Exploration and development within ACEC's would require a plan of operations and additional public comment, thereby insuring the increased oversight and review without locking up potential mineralized areas.

Thank you for the opportunity to review and comment on DEIS. We hope the comments we provided will improve the document and associated decisions.

Sincerely,

Gregory McN. French

Gregory McN. French, Consulting Geologist

Michael R. Stanley, President

Michael R. Stanley

19-5

19-5: Because of the moderate potential for occurrence of minerals, the area is recommended for withdrawal. Past experience in the area (the Tucker Hill Mine, which impacted significant cultural resources) has identified the need for withdrawal to guarantee protection of sites in the Red Knoll area. Significant interest on the part of various Tribes supports this issue. Under current regulations, protection is limited without withdrawal. Because the area has traditional significance to the Klamath Tribes, as well as to other Tribes in the area, it will be nominated as a traditional cultural property. Any use of the area involving extensive surface disturbance or occupation through such activities as road building or mining would have a significant adverse effect on the area's traditional use values. In order to protect those values to the maximum, under the Proposed RMP/Final EIS the resource area would petition the Secretary of the Interior to withdraw the area from mineral entry.

Rodger White

Thursday, December 13, 2001

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

Regarding: Draft Lakeview Resource Area Management Plan (RMP/EIS).

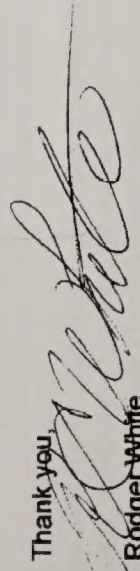
Dear Mr. Sykes,

While the BLM's preferred alternative (D) contains some good features, it makes compromises with are not in the best interest of the land. I believe that elements of Alternatives C and E should be included in the final RMP/EIS.

The following provisions should be included in the final RMP/EIS:

- From Alternative C - Limit Off Road Vehicle (ORV) use across the *entire* Lakeview Resource Area. Eliminating open ORV access would significantly reduce and possibly end ORV damage on the BLM lands concerned.
- From Alternative C - Exclude ORVs from the Sand Dunes and Lost Forest Areas of Critical Environmental Concern (ACEC). ORVs currently cause irreparable damage with no discernable benefit to the land. (The Sand Dunes is also a Wilderness Study Area (WSA)).
- From Alternative C - Recommend Wild and Scenic River status for three listed streams, and manage for those values until legislation designates them.
- From Alternative C - Close 500 miles of roads in WSAs, ACECs, and Wild and Scenic River corridors and close all roads in riparian areas.
- From Alternatives C, D & E - Add the listed 1,194 acres to existing WSAs.
- From Alternatives C & D - Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- From Alternative E - Eliminate grazing or reduce it by at least 20% overall and exclude grazing from riparian areas.
- From Alternative E & C - Eliminate all energy and mineral extraction or close a high percentage of the area to mining.
- From Alternative E & C - To protect natural resource values, eliminate or greatly limit Special Recreation Permits.

Thank you,



Rodger White
2020 Highway 99 North #14
Ashland, Oregon 97520

PO Box 987, Ashland, OR 97520 ♦ 541-482-3509 or 541-840-6455 ♦ rcwhite@mind.net

January 2, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

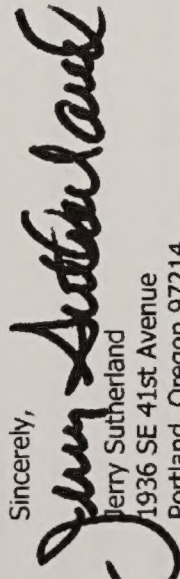
I am writing to encourage BLM to select Alternative C instead of Alternative D of the Draft Lakeview Resource Management Plan. The high desert country of Central Oregon is one of the special places in this great state, and it deserves the stewardship that Alternative C provides.

I especially like that Alternative C would close off the Sand Dunes WSA and Lost Forest ACEC from off road vehicles. This is a sensitive, unique area that I enjoy and would visit more often if it weren't for the racket and destruction created by the ATVs. I have long wanted to hike out into the Sand Dunes but have not done so for fear of getting run over by one of these machines flying over a hill on top of me. The whole idea of wilderness is to have places to get away from the noise and intrusion of machinery, so for BLM to allow these machines to continue having the run of a place that has the potential to become one just isn't right.

For that matter, none of the Lakeview Resource Area should be designated Open to ORVs. If motorized enthusiasts want play areas, let them contract with private property owners who are willing to have their lands sacrificed. Any use of public lands that destroys its potential use by others and harms the land and life it supports should not be allowed. The use of ORVs by hunters, fisherman, those who are physically challenged, BLM staff, and other government agency personnel is perfectly acceptable. But the use of roads is adequate for all these purposes. No one needs to ride cross country.

There are a lot more things about Alternative C that I like, and I want to compliment the Lakeview BLM staff for putting together this alternative. Now I hope you will have the courage to take the final step of selecting it. Future generations of Oregonians will thank you.

Sincerely,


Jerry Sutherland
1936 SE 41st Avenue
Portland, Oregon 97214

LAKEVIEW R.I.A.
JAN - 7 2002
RECEIVED
3 January, 2002
43530 Hiway 31
Paisley OR 97636

Attention: Dwayne Sykes,
RMP Team Leader
U. S. Department of Interior
Bureau of Land Management
HC 10 Box 337
Lakeview Oregon 97630

Draft Lakeview Resource Management Plan

VOLUME ONE:

I find the document very difficult to understand and do not believe the common person on the street would comprehend any of it.

The very first thing is all of the references made to Web sites that cannot be accessed. How can they be accessed?

I do not believe the plan to be in compliance with the Lake County plan of 1992 (page 1-11)

Page 2-1... The plan has a tendency to mislead as per the Post Offices of the early 1900's. Christmas Valley is a product of M. Penn Phillips, 1960's era not as one of the 1900's homesteader's post offices. This misleading statement should be corrected.

I believe with more work you will find others visited Lake County, not just Peter Skein Ogden in 1826. The statement of "no further interest was shown until Fremont in 1843" is inaccurate. There could have been several others including John Work in 1832. (Reference Lake County Historical Society *LAKE COUNTY No 1, November 1, 1985.*)

2.25... Community Drinking water—"towns, small communities and private farms and ranch residences all use ground water" .. Where are the references for ranch residences? I am aware of some that do not use ground water as defined.

2.28.... I believe it to be confirmed that planter fish have mixed already with Red Band.

2.31.... "For example wet meadows are converted to dry meadows as a result of lowering water tables cause by irrigators pumping and surface water diversion"... I believe there is a lot of wet meadows established by both types of irrigation. Our home meadow at Summer Lake as one example.

22-1: The Draft RMP/EIS text, maps, and digital datasets were placed onto BLM websites in early November 2001. However, in mid-November, a court injunction was placed on all Department of Interior agencies, including the BLM, preventing the dissemination of Indian trust data. This resulted in the shutdown of public access to all BLM web sites and email services. The injunction was lifted in early March 2002 and website access was restored. This shutdown was unfortunate, but beyond the BLM's control. Postcards were mailed to everyone on the RMP mailing list in late January 2002 notifying them of this problem and asking them to submit comments through regular mail rather than email.

22-2: The BLM is required to conform to county land use plans, *to the extent possible*; where conformance is not possible, the BLM's only requirement is to identify that a conflict exists. In this instance, some components of the Proposed RMP/Final EIS do not conform to the 1992 "Emergency Ordinance and Interim Public Land Management Plan." This is clearly stated in Chapter 1.

22-3: It should read only two post offices exist in the area today, and the text has been changed. Each post office was an indication of settlement in the area. While Work and others may have visited the area, which is questionable, nothing of significance happened in Lake County until after Fremont visited the area. The publication of his work created a great interest in, and relocation to, the West.

22-4: The definition of groundwater was incorrect in the glossary and has been corrected.

22-7 | 2.69.... Are there feedlots at Paisley, Adel or any other location in Lake County that feed for profit?

VOLUME 2:

I do not believe the Interior Columbia Basin Ecosystems Plan should be referenced as I believe it to be a flawed document because of too many assumptions.

22-8 | There are references in all documents to "Public Lands and Federal Lands". I believe them to be intermingled and not used as defined by the Federal Court. Where are the Public Lands in Lake County?

22-9 | A-78.... Area 416... Where is the medusahead rye in this allotment? I do not believe grazing is affecting water quality on Federal Land.

22-10 | A-237.... I do not concur that Red Knoll meets the relevance criteria.
1. What is the historic cultural or scenic value? The area has several roads and trails.
2. I know of no fish in the area.
3. I do not believe it is a natural area; there again roads and trails, water troughs and crested wheat seedings.
4. Where are the natural hazards?

22-11 | Map L-8.... The map does not show the Clover Flat road or any of the many spur roads that lead from it to other locations. Many more roads are in the area.

22-12 | Map SMA-19.... Red Knoll ACEC/RNA. I don't believe this area to be a natural area; there are roads and trails, crested wheat seedings, fences and spring developments.

If some of these roads are closed it will make it much harder to control medusahead rye.

22-13 | Most of this area is surrounded by private property. Will it in any way effect the private property?

VOLUME 3

Map L-8.... This map does not show the Clover Flat road or any of the many spurs that lead to other locations. There are many more roads in the area.

Map SMA-19....Red Knoll ACEC/RNA. I don't believe this area to be a natural area: there are roads, trails, crested wheat seedings, fence, spring developments.

If some of these roads are closed it will be much harder to control medusahead rye. Most of this area is surrounded by private property; will it in any way effect private property?

The U.S. Environmental Protection Agency's "Envirofacts—Data Warehouse and Applications" website is the reference for the community water systems. It was inferred from that site that farms and ranches would also use groundwater for human consumption. Relying on your local knowledge, the text has been changed to reflect different sources of drinking water.

22-5: As reported in the "Status Review for Great Basin Redband Trout" (USDI-USFWS 2000), a few genetic studies on redband in the Great Basin show a certain amount of introgression of hatchery trout into the native redband population. This introgression is usually found in the mid-elevation reaches with upper and headwater reaches maintaining the native trout. Planted fish tend not to survive long enough to intergrade with the native redband.

22-6: The example (wet meadows are converted to dry meadows as a result of lowering water tables caused by irrigation pumping and surface water diversions) was given as a general type of effect from management which occurs throughout eastern Oregon. Because it is not specific to the LRA, it will be removed from the text. There are private diversions and ditches on BLM-managed land which move water out of stream systems onto private lands. The section of stream above a diversion can store water and raise the watertable. However, the BLM-managed section of stream below the diversion would have less water available when water is being diverted; therefore, there is less water flowing in that section of stream and floodplain.

22-7: As a result of this comment and related comments, the BLM has consulted with Marni Porath, Lake County Extension Agent, and clarified this discussion in the main text.

22-8: Generally, all lands owned by the Federal government could be considered Federal lands. However, with the passage of FLPMA, the term "public lands" means any land and interest in land owned by the United States and administered by the Secretary of the Interior through the BLM. Therefore, according to the FLPMA, all lands in Lake County administered by the BLM are considered public lands.

22-9: Visual inspection has not revealed evidence that grazing is affecting the water quality of Kelly and White Hill Creeks within the allotment. If there is a change in management or water quality, an effects analysis will be conducted, and grazing will be assessed for possible effects on water quality. A rangeland health assessment is tentatively scheduled for 2005.

BLM staff have not determined conclusively that medusahead exists in this allotment. It is mentioned in the Appendix as being a concern for that allotment because medusahead occurs in the Clover Flat area south of Paisley and, over the life of the RMP, medusahead could spread to Allotment 416.

22-14 Were any of the adjoining property owners notified of this ACEC and given a chance to be involved?

22-15 Map W-1.... Are these reported leks on private property? When were they documented and by whom?

I am familiar with this area and have never seen any leks on federal lands?

22-16 May M-4.... What is the legal description for the mineral in T35S, R19E by quarter section?

How was this located and by whom?

22-17 Map R-4.... There are lots more roads than these. Some major ones are there; one would be the Clover Flat road.

22-18 I n grazing area 406 I do not believe juniper to be a problem. The reference to quaking aspen seems to be misplaced. If not, where are they located in this area?

I believe that controlled burns should be utilized in area 422 as a management tool.

Thank you,

Bob Elder

Bob Elder

22-10: The ACEC proposal for Red Knoll is not based upon natural or ecological values. The area has been identified to the BLM by Native Americans as a traditional cultural property with values of importance to them. The area was and is used to maintain cultural traditions. The values present are not necessarily impacted by the existing seedings and other disturbances. Roads in the area are limited due to the rugged nature of the topography. Nearly all roads have been left open in the proposed plan (refer to Map SMA-19). Native Americans could use these roads for access to the area, as could the public and landowners in the area.

22-11: This map only shows major roads within the planning area. It is not possible to show all existing roads on a map of this scale.

22-12: Please see response to comment 22-10.

22-13: The designation of the Red Knoll ACEC/RNA does not apply to surrounding private land.

22-14: All landowners have not been contacted individually during the preparation of this plan. However, in June of 1999, a legal public notice was published in several local newspapers, followed by a public scoping packet sent to our mailing list, which included the grazing permittees in the resource area. That packet indicated that the designation of ACEC's was one issue that would be addressed in the plan. In the summer of 2000, the "Analysis of the Management Situation" was sent to our mailing list, including grazing permittees. This document showed general locations of the proposed ACEC's and their associated values; it did not show specific boundaries. This is documented in Chapter 5.

22-15: The map of greater sage-grouse leks on page W-1, Volume 3, represents all of the known leks sites that have been occupied at one time or another since about 1964. These sites came from a variety of sources, including the ODFW, BLM employees, and private ranchers. Some of these leks are historic and are no longer occupied. We are in the process of updating this map with the best information available and hope to have this update ready for the final draft of the RMP. According to our records of land ownership, seven of these leks occur on the borders between BLM-administered land and private property. Three leks do occur on private property east of Warner Valley. If specific leks are in question, large-scale maps of leks can be reviewed at the Lakeview Interagency BLM office.

22-16: The base metal potential of mercury was identified by the State of Oregon Department of Geology and Mineral Industries in the reference, Peterson, N.V., and McIntyre, J.R. 1970. "Geology, Mineral Resources of Klamath & Lake Counties Region, Oregon, State of Oregon, DOGAMI."

T.35S.,R.19E., section 23, S $\frac{1}{2}$
T.35S.,R.19E., section 26, all
T.35S.,R.19E., section 27, S $\frac{1}{2}$, E $\frac{1}{2}$
T.35S.,R.19E., section 33, E $\frac{1}{2}$
T.35S.,R.19E., section 34, all
T.35S.,R.19E., section 35, SW, N $\frac{1}{2}$
T.36S.,R.19E., section 2, NW, NW
T.36S.,R.19E., section 3, N $\frac{1}{2}$
T.36S.,R.19E., section 4, NE

22-17: Please see response to 22-11.

22-18: Regarding Allotment 406: the juniper and aspen concern does not apply here, and it will be taken out of the text in Appendix E.

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

January 1, 2002

Dear Mr. Sykes,

I am writing to ask that the BLM chose Alternative C of the Draft Lakeview Resource Area Management Plan instead of its preferred choice, Alternative D, I favor Alternative C because it would:

- * Designate zero acres as Open to cross country travel by ORVs [off road vehicles].
- * Exclude ORVs from the Sand Dunes Wilderness Study Area [WSA] and Lost Forest Area of Critical Environmental Concern [ACEC] where they currently are wreaking havoc.
- * Recommend Wild & Scenic River [WSR] status for three streams and manage them as such.
- * Close 500 miles of roads in Special Management Areas [WSAs, ACECs, and WSRs].
- * Close all roads in riparian areas.
- * Add 1194 acres to existing WSAs.
- * Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- * Reduce grazing by at least 20% and exclude it from riparian areas entirely.
- * Close a high percentage of the area to energy and mineral extraction.
- * Limit the number of Special Recreation Permits as needed to protect natural resource values.

Thank you for your consideration.

Sincerely,

Nicky Phear

Nicky Phear
223 West Kent
Missoula, MT 59801

RECEIVED

JAN - 7 2002

LAKEVIEW, B.L.M.

3586 NE Stanton
Portland, OR 97212
January 4, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to ask the BLM to choose Alternative C of the Draft Lakeview Resource Area Management Plan (instead of the preferred Alternative D).

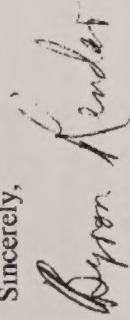
The BLM has admitted that the explosive growth in ORV travel has left it unable to neither keep up with the damage caused nor enforce regulations. So the problem is going to get worse.

Alternative C solves the problem by not allowing cross-country travel by ORV. And since the majority of ORVs are law abiding you will need to spend fewer resources to prevent illegal use and fewer resources to repair or restore damaged areas.

ORV use has critically damaged many areas of the Lost Forest Area (an Area of Critical Environmental Concern) and the Sand Dunes WSA, which as I understand should have nothing happen to it that would degrade its potential for wilderness.

Alternative C would also protect riparian areas, reduce grazing, and enhance existing WSAs. I urge you to choose Alternative C. Thank you.

Sincerely,


Byron Rendar

RECEIVED

JAN - 9 2002

Kim Frymire
2517 South West Hailey Avenue
Pendleton, Oregon

LAKEVIEW, B.L.M.

97801

December 7, 2001

Lakeview Resource Area
Lakeview District Office
HC 10 Box 337
1300 South G Street
Lakeview, Oregon 97630

To Whom It May Concern:

Regarding the Draft Resource Management Plan/Environmental Impact Statement. I have reviewed the draft document and have the following comments regarding Alternative C and Alternative D, your preferred alternative.

25-1 Under D Plant Communities point one, management goal one, (page 3-12) proposes to "maintain or restore natural values while providing for forage production". However the main goal of Alternative D is to "**protect and improve natural values** while providing commodity production". Yet point one manages for considerable less than the main goal. I found this to be a common error through out the Alternatives. Therefore point one should manage for "an increase or restoration of natural values while providing for forage production". Furthermore I would suggest that previous land management activities have lead to the degradation of both natural values and adequate forage. Various native components of the ecosystems in your area, as in much of the West, are either missing or have a very low occurrence rate. However by "increasing or restoring natural values" the composition and structure of native species will increase thus providing forage for wildlife and others, recreation, and secondary products.

25-2 Under the management goals for water resources point three, alternative D: You propose to "maintain minimum conditions of a healthy watershed" (page 3-17). Is the **minimum condition** the most the Lakeview Resource Area is striving toward? I would hope that you and all federal agencies strive for more than the very **minimum**. I hope that what you are truly striving for is no less than maintaining the minimum conditions of a healthy watershed.

25-3 Under the management goals for wetlands/riparian areas point four (page 3-14), alternative D: You propose to "implement or maintain grazing systems that promote the recovery or maintenance of riparian systems". I saw no proof or references cited in your draft document of any type of grazing system that neither promotes nor maintains riparian systems. Any management tools used in such fragile and important areas should have solid proof of success using the tools. This is especially important when human and animal health is at stake.

25-4 Under the management goals for fish and aquatic habitat point five, (page 3-19) alternative D: Again I saw no proof or references cited in your draft document of any

25-1: On Page 3-12, *maintain or restore* has been changed to *protect and improve natural values* in Action 1 under Management Goal 1, Alternative D.

25-2: The BLM would manage for healthy watersheds, directing management toward defining and achieving healthy watersheds in a variety of ways. The BLM would define the desired range of conditions for riparian areas and inventory riparian ecological types, comparing them to potential natural vegetation, geomorphic stream structure, and soil conditions. The BLM would also conduct ecosystem analyses at the watershed scale, rangeland health assessments, and develop water quality management plans.

25-3: Most riparian systems in the LRA are improving as a result of livestock exclusion and management. There are several pastures (Parsnip Seeding and Camas Riparian, for example) that have improved with grazing under controlled management. Chapter 2, Table 2-5, provides information on stream condition, described as proper functioning condition, by management that indicates improving trend on 7.8 miles out of 9 miles on streams managed with grazing. While proper functioning condition is a limited condition assessment, observation of the above stream segments indicates improving conditions toward

L-25

type of grazing system that promotes improvement or maintains riparian systems. This of course does not mean that it does not exist; you do however need to show scientific proof that these management tools will work.

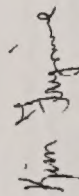
25-5

Under the management goal two for cultural resources (3-26), alternatives B, C, and D: Have studies been done in your area on interpretive structures on site and how these affect the cultural resources? Does an on-site interpretive structure decrease damage and vandalism while increasing the public's knowledge? Or does the structure increase vandalism and create the need for patrols and replacement of structures? If a study has not been done in your area I would suggest such a study prior to implementation of interpretive structures in your area.

Regarding the status of Areas of Critical Environmental Concern (ACEC): My concerns are for the protection of the Lost Forest. I have seen little enforcement of the protection measures the Bureau has in place during my visits to the area. I have seen repeated vandalism in the form of illegal tree cutting, desecration of religious and cultural sites, and off road use in areas designated for NO off road use. The Lakeview Resource Area has done a fine job of signing the no off road use areas, but little enforcement is practiced. The Red Knoll ACEC also needs **PROTECTION**. I cannot emphasize how much this very unique area needs our care and protection wither it be from vandals or future management plans. The preferred alternative regarding mineral extraction for the Red Knoll ACEC calls for the removal of a "portion (4,600 acres)" of the ACEC. I would encourage a change in the preferred alternative to the withdrawal of the entire ACEC. Adjacent areas to the Red Knoll are currently being mined as part of the Tucker Hill perlite mining area. The Lakeview Resource area already provides more than sufficient mineral removal sites to support the needs of the public and some private interests. Further more as stated in your draft (page A-248) the Red Knoll area has at least one Bureau sensitive plant *Symphoricarpos longiflorus*. Also several important plant species occur in this area such as the disjunct population of *Opuntia fragilis*. The closest Cactus of this genus is found in the Yakima valley of Washington State and in Nevada. Further more the area contains culturally significant sites of a number to great to list in this letter. These sites are not only significant to local peoples, but are of interest to those of us outside of the immediate commuting area. Further mineral extraction would lead to further degradation of the special area.

25-6

Respectfully,



Kim Frymire

site potential where grazing is being conducted strictly to prescription. A description of grazing management has been added to the BMP's section (Appendix D). One consolidated reference of grazing and riparian improvement is Platts W. S., 1991. Livestock Grazing. American Fisheries Society Special Publication 19:425-457.

25-4: Please see response to comment 25-3.

25-5: No studies have been done on whether interpretive sites increase or lessen damage. From observation with recreation sites, state parks, national monuments, etc., interpretive sites seem to lead to resource damage (but it is unknown whether this damage would be lesser or greater without the interpretive site and whether the interpretive site deters damage at other locations).

25-6: Under the Proposed RMP, the BLM would petition the Secretary of the Interior to withdraw approximately 4,600 acres. The final decision would be made by the Secretary. This area contains the highest mineral potential within the Red Knoll ACEC and would be the area most likely to be explored and developed in the future. The existing perlite operation of Cornerstone Minerals on Tucker Hill is outside the north boundary of the Red Knoll ACEC, as is their claim block. As stated in the Mineral Development Scenarios in Appendix N2 in the Draft RMP/EIS, mining operations on Tucker Hill are not expected to go beyond the existing claim block during the life of this RMP. As a result, current and foreseeable operations are not expected to have a negative impact on the Red Knoll ACEC. Likewise, designation and management of the Red Knoll ACEC is not likely to have a negative impact on current perlite mining operations on Tucker Hill.

L-25



U.S. Department of the Interior
Bureau of Land Management
Lakeview Resource Area
Lakeview, Oregon



Public Meeting for Lakeview Draft RMP/EIS

LEAVE COMMENTS AT REGISTRATION TABLE OR FOLD, STAPLE, AND MAIL.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Lakeview BLM Office, 1300 South G Street, Lakeview, Oregon during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: _____

Address: _____

Comments. I WOULD LIKE MY NAME AND ADDRESS WITHHELD.

of all the management alternatives offered, I favor alternative "C". Alternative "C" manages habitat for wildlife through limiting grazing, restoration of natural vegetation and takes good strides toward protecting ~~the~~ existing habitats. I also like "C" because it will appropriately protect the Fossil Lake, Sand Dunes, and Lost Forest areas. History has shown that many OHV riders do not respect existing restrictions and damage areas they should not be in. It has been proven that the Lost Forest trees are genetically distinct and should be preserved in the interest of biodiversity. Fossil Lake is sacred only to the In Dena. For Pto for specimens of the Pleistocene and is a type site for several species. Only a couple of people benefit from the OHV dollars, but OHV people destroy resources and leave lots of

Signature: _____

Date: 1/6/02

11th and waste and trash behind when they leave.

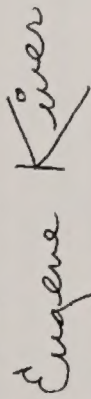
January 7, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am commenting on the Draft Lakeview Resource Area Management Plan. Without question, Alternative C is the best alternative. Cross country travel with vehicles is extremely destructive and leaves lasting scars and promotes erosion in addition to plant destruction. I have witnessed a number of wonderful areas, especially those with fragile dune environments, become trashed by these activities. Designation of Wild and Scenic River areas and closing roads in the Special Management areas and riparian areas is absolutely necessary. Enlarging the existing ACECs and to adding to 12 new ACECs is splendid and will help protect these valuable public lands for wildlife and more reflective use of these national treasures.

Sincerely,



Eugene Kiver
22206 S Frog Hollow Ln
Cheney, WA 99004

RECEIVED

JAN 11 2002

January 8, 2002

LAKEVIEW, B.L.M.

To: Bureau of Land Management
Lakeview, Oregon 97630

To Whom it May Concern,

We are writing in regards to the Bureau of Land Management's draft for the Lakeview Resource Management Plan/Environmental Impact Statement.

We support Alternative A. All of the other Alternatives point to nothing but more and more removal of Public Land FROM the Public.

Please take into consideration our support for Alternative A. It has come the time FOR the PUBLIC to do everything in their power to save our PUBLIC LANDS. What we don't NEED or WANT is more Land Restrictions imposed upon us.

There definitely is such a thing as LEAVING WELL ENOUGH ALONE.....and this is certainly a perfect example of just that. Public Lands need to be kept just that, PUBLIC so we CAN access and use this land as it was originally intended.

Thank you,

Donna C. Ellis

Dick & Donna Ellis
5995 N.E. Elliott Circle
Corvallis, Or. 97330

January 11, 2002

FAX, this page only, to 541-947-6399

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

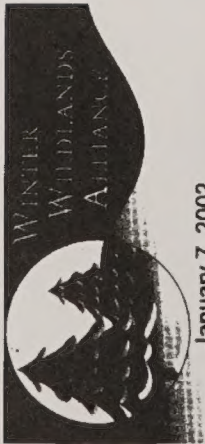
RE: RMP/EIS Lakeview Resource Area

Dear Mr. Sykes,

- I support BLM's Alternative D.
- I have had the opportunity to assist with the Oregon Flora Project in the Lakeview BLM area, studying cattle grazed areas for both native and alien species, including grasses. I have also visited private ranch land, with owner permission, as well as their BLM grazing permitted sites in the Vale BLM District.
- Denzel & Nancy Ferguson states (on page 96 of their book *Oregon's Great Basin Country, Maverick Publications, 1978*) that 10-acre plots at Squaw Butte Experiment Station that have not been grazed for over 40 years look no different than continually grazed adjacent land.
- The Nature Conservancy, the largest environmental organization in Oregon, has demonstrated on their own lands, such as Sycan Marsh, that working with local ranchers and other partners, providing experienced restoration specialists on site, can result in restoration of desired flora, wildlife, and riparian areas.

Sincerely yours,

James T. Post
4247 Tami Lane
Central Point, OR 97502-1063



January 7, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

RECEIVED
JAN 11 2002
LAKEVIEW, B.L.M.

Dear Mr. Sykes,

As Grassroots Coordinator for Winter Wildlands Alliance, a national non-profit organization dedicated to preserving winter wildlands and a quality human-powered snow sports experience on public lands, I strongly urge you to adopt **Alternative C** of the **Draft Lakeview Resource Area Management Plan** instead of the other choice, **Alternative D**.

Winter Wildlands Alliance urges you to adopt **Alternative C** because it would:

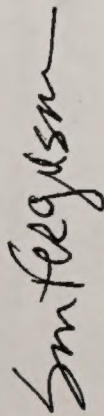
- Designate zero acres as "open to cross country travel" by ORVs [off road vehicles].
- Exclude ORVs from the Sand Dunes Wilderness Study Area [WSA] and Lost Forest Area of Critical Environmental Concern [ACEC] where they currently are causing serious damage to area habitat.
- Recommend Wild & Scenic River [WSR] status for three streams, which includes appropriate management plans.
- Lose 500 miles of roads in Special Management Areas [WSAs, ACECs, and WSRs].
- Close all roads in riparian areas.
- Add 1194 acres to existing WSAs.
- Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- Reduce grazing by a minimum of 20% and totally exclude it from riparian areas.
- Close a high percentage of the area to energy and mineral extraction.
- Allow a limit to be set on the number of Special Recreation Permits issued, in order to protect natural resource values.

Phone 208. 336. 4203 • Fax 208. 334. 2968
910 Main Street Ste 235 • Boise, Idaho 83702
www.winterwildlands.org • info@winterwildlands.org

Adopting **Alternative C** of the **Draft Lakeview Resource Area Management Plan** will set a positive precedent in requiring the BLM to do its job of enforcing existing off-road vehicle laws, regulations, and executive orders. Additionally, establishing these public lands as non-motorized ensures a quality, near natural experience, while eliminating adverse impacts to users, such as noise, order, pollution, and damaged landscapes.

Thank you for the opportunity to comment.

Sincerely,



Sally Ferguson
Grassroots Coordinator
Winter Wildlands Alliance
910 Main Street, Suite 235
Boise ID 83702
208.386.9227
www.winterwildlands.org

AFTER REVIEWING THE BUREAU OF LAND MANAGEMENT'S DRAFT LAKEVIEW

RESOURCE MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT, I URGE SUPPORT FOR ALTERNATIVE A, NO CHANGE IN MANAGEMENT. THIS DOES NOT IMPLY SATISFACTION WITH CURRENT MANAGEMENT BUT THE DESIRE TO KEEP PUBLIC LANDS OPEN AND ACCESSIBLE TO THE PUBLIC. I DO NOT WISH TO SEE ONE MORE PUBLIC ROAD OR ONE MORE ACRE OF PUBLIC LAND REMOVED FROM PUBLIC ACCESS AND OR USE.

31-1 |

READING THE DOCUMENT REVEALS NOT A 15 TO 20 YEAR MANAGEMENT PLAN BUT 'THE LONG TERM VISION MAYBE 50 YEARS OR LONGER.'

THE OTHER ALTERNATIVES AMOUNT TO STEALING THE PUBLIC LAND FROM THE PUBLIC, WHETHER THEY ARE LISTED AS WILDERNESS AREAS, WILDERNESS STUDY AREAS, RESOURCE NATURAL AREAS, AREAS OF CRITICAL ENVIRONMENTAL CONCERN OR WILD AND SCENIC RIVERS, THEY WILL BE LOST TO THE PUBLIC FOREVER.

31-2 |

LAKE COUNTY IN 1992, PASSED THE "EMERGENCY ORDINANCE AND INTERIM PUBLIC LAND MANAGEMENT PLAN". THIS ORDINANCE DOES NOT SUPPORT THE DESIGNATION OF ANY ADDITIONAL WILDERNESS AREAS OR RMA'S WITHIN THE COUNTY.

RECENT REVELATIONS OF GOVERNMENT IMPROPRIETIES IN SCIENTIFIC STUDIES (WASHINGTON AND OREGON LYNX STUDIES), THE USE OF DECEPTIVE LANGUAGE IN THE RMP/EIS ITSELF IN AN ATTEMPT TO IMPART A NONEXISTENT URGENCY FOR MORE LAND RESTRICTIONS (" GREATER SAGE GROUSE, A FEDERAL CANDIDATE 2 SPECIES, HAVE BEEN SEEN NEAR THE STUDY CORRIDOR ON FISH CREEK RIM (OF COURSE THEY'VE BEEN SEEN THERE, THATS WHERE THEY LIVE! AND THEY ARE NOT SCARCE!!) AND CURRENT LONG TIME LAKE COUNTY ECONOMIC DEPRESSION, DICTATE A NO CHANGE (ALTERNATIVE A) ADMINISTRATIVE POLICY UNDER MULTIPLE USE PRINCIPLES.

BLM MUST RECIEVE PUBLIC COMMENTS BY LATE JANUARY.

WRITE: BLM

HC 10 BOX 337
LAKEVIEW OREGON

97630

EMAIL -
DISYKE@OR.BLM.GOV

John Bach

John BACH

859 N. G. St.

LAKEVIEW, OREGON

97630

*Received Jan 14, 2002
at Lake County Chamber
of Commerce Forum*

31-1: The RMP would guide management of the resource area for 15 to 20 years. It is expected that most of the actions described in the plan would be completed during that time. However, the results of those actions on a landscape scale, such as changes in vegetation, changes in riparian areas, improvement of water quality and aquatic habitat, and changes in wildlife habitat and wildlife numbers, would likely occur over a much longer time frame (the 20 to 50 year time frame discussed in Chapter 1 of the Draft RMP/EIS). Current BLM planning regulations require that land use plans be replaced, revised, or amended on a cyclic or as-needed basis. Traditionally, plan replacement occurs every 15 to 20 years. It is expected that this particular plan would be replaced after that time frame. However, it is intended that the improvements in the landscape envisioned here would be well on their way during the life of this plan.

31-2: Please see response to comment 22-2.

90 DWYANE SYKES

I GOT YOUR NOTICE OF MTG TO PLAN 20M.
ACRES ON FRIDAY. THAT IS THE DAY AFTER
THE COLLEGE SWAGE BOUL. WAS THE MTG
ON THE SAME NIGHT?

20M. AC. IS ALOT OF PLANNING AND
20M. VIEWER'S OF THE GAME WAS PROBABLY

JUST BAD PLANNING. I HOPE THE 20M.
AC. GOES BETTER

TO SUGGEST ANOTHER MTG ASAP WITH
NOTICE'S @ EACH POST OFFICE, FREE AD IN
WHISPER'S AND PUBLIC NOTE IN LAKEVIEW
NEWSPAPER NOTICES @ EACH CAFE
AND LASTLY @ GAS STATIONS AND
WEIGHT STATIONS

WE IN N. LAKE COUNTY WANT TO
HELP AND PARTICIPATE AND REVIEW. FOR
WE KNOW YOU'LL GET "LOTS OF HELP" FOR
THE ORGANIZED WACKO'S --- THERE TOB
IS TO GO TO MTG. --- ARE'S ARE TO PAY
TAXES FOR YOU.

PLEASE FORWARD TO ME, ALL DATA
SO, PLEASE FORUM JUST THE SAME STUFF
IN THE PUBLIC GET AND WE WOULD LIKE TO
THE WACKO'S GET AND WE WOULD LIKE TO
PARTICIPATE. THANKS

No. Lake Co. Advance
HOWARD PAUL
14866 OATMAN FOOT LANE
LAKEVIEW, BLM.

RECEIVED
JAN 15 2002
LAKEVIEW, BLM.

● RECEIVED ●

JAN 15 2002

LAKEVIEW, B.L.M.

Jan. 14 2002

To whom it may concern
I, Robbie Gene Lake, a 55 year
resident of Lake County would like to
go on record as being in favor of
alternative H.

Thank you

Robbie Gene Lake
957 So J st.
Lakeview, Oregon

RECEIVED

JAN 15 2002

LAKEVIEW, B.L.M.

January 14, 2002

To Whom this may concern,

I am writing this response in regards to the Bureau of Land Management's draft for the Lakeview Resource Management Plan / Environmental Impact Statement. First of all, I am disappointed and not agreeable to most of the plan but as we the public have learned over the past few years, that does not account for much. If I had to support the plan, I would urge support for **ALTERNATIVE A**, which is "**NO CHANGE IN MANAGEMENT**".

As a lifelong resident of Lake County, I desire to keep the public lands open to the public. One more road closed, or one more acre of land removed from public access is intolerable. As an active outdoors man, who enjoys hunting, fishing, camping, hiking, horseback riding, and watching wildlife, the closing of additional public lands would be a terrible act to those who enjoy the land and who it was intended to be utilized by. Just exactly "who" are you trying to protect the land from?

In reading your statement document, it revealed a 15 to 20 year management plan, but "The long term vision maybe 50 years or longer." Is this just one step away from taking it away forever? The other alternatives in the management plan are simply taking public lands away from the public and those who utilize it. That is why I will support Alternative A, which according to my reading, is no change at all. Through the years I have learned different terminology that essentially mean the same thing in the eyes of the public - taking away our rights to access public lands. Some of these labels include: Wilderness Study Areas, Resource Natural Areas, Areas of Critical Environmental Concern, and Wild and Scenic Rivers.

In the plan I also encountered what I call some deceptive language that may change the views of a outsider or someone who did not know anything about these areas. For example and I quote, "Greater Sage Grouse, A federal candidate 2 species, have been seen near the study corridor on Fish Creek Rim." **NO KIDDING!** That is where they live and have lived for generations. Not only that, but they are abundant. The wording makes it sounds like the just moved there!

Please note that Lake County in 1992 passed the "Emergency Ordinance and Interim Public Land Management Plan". This plan essentially supported that there should not be any additional wilderness areas or RNA's designated in the county.

In conclusion, my family and I have already had to endure the closing of hundreds of roads throughout the forest and other lands in Lake County. Personally I find it an insult to the men and women throughout the years who worked so hard to manage the very land you propose to close. This includes everyone from the timber industry, ranchers, hell even employees of your own agency. In times of economic depression along with other factors impacting our community, closing additional lands -- the one thing we the people have always had and always been able to access could be gone; maybe for years or maybe forever. Please consider **ALTERNATIVE A**, no change to the current management plan.

Sincerely,

Ryan J. Davidson

Ryan J. Davidson
90924 Shults Lane
Lakeview, OR 97630

34-1

34-1: Please see response to comment 31-1.

34-2

34-2: Please see response to comment 22-2.



1330 East 25th Street • Eugene, Oregon 97403 • (541) 344-1053

15 January 02

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes,

As part of a Lane Community College field trip, I was lucky this fall to have a week walking about and camping on Hart Mountain.

Tori Noon gave our group a fine talk about wildlife refuge history and Great Basin land use and management.

Everything I've heard and read indicates that overgrazing has done more than anything to compromise Great Basin range/grass land. I'm a member now of the

RECEIVED

- 2 -

JAN 16 2002

LAKEVIEW, B.L.M.

Oregon Natural Desert Association, so am
receiving their bulletins. I write
in response to a bulletin about the

Lakeview Resource Management Plan.
My message is simple; protect more
acres from grazing! Value, in the
long run, will remain in well-
managed lands, not in butcher
meat!

I appreciate the chance to
be part of the public comment
phase of your planning.

Best wishes,

Erik Moller

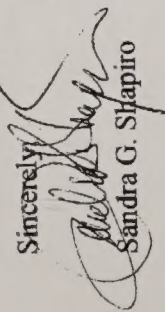
January 14, 2002
32425 Boones Bend Rd.
Wilsonville, OR 97070

Dwayne Sykes, RPM Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

I would like to comment on the management of the Lakeview Resource Area. If we declare certain areas as public lands, then our stewardship should be the preservation and enhancement of these natural areas. Allowing off-road vehicles to access these areas does neither and only contributes to its destruction. These ORV should be also excluded from the Sand Dunes Wilderness Study area and Lost Forest Area. Mineral and energy extraction, as well as grazing, needs to be reduced or excluded if we are serious in preserving these natural areas. Closing miles of unneeded roads would do much in allowing the environment to heal. And let us not forget riparian areas. I may never see or use these lands for recreation but feel they must be preserved and restored. I also want the BLM to CHOOSE ALTERNATIVE C, not Alternative D.

Sincerely,


Sandra G. Shapiro

RECEIVED
JAN 16 2002
LAKEVIEW, B.L.M.

15 January 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

RECEIVED
JAN 16 2002
LAKEVIEW, B.L.M.

Mr Dwayne Sykes:

I am writing to urge you to persuade the BLM to reject Alternative D & instead choose a strengthened **Alternative C** that excludes livestock grazing and off-road vehicles from:

- * proposed wild & scenic rivers
- * critical fish & wildlife habitat
- * sage grouse leks
- * areas of critical environmental concern
- * wilderness study areas
- * grazing allotments in fair or poor condition

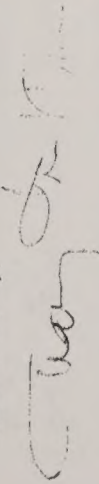
The "adaptive management" plan, is no substitute for objective standards & guidelines. That is, without constant, on-the-ground monitoring, adaptive management may only lead to further resource degradation.

Mr Sykes, the public has so little "wild" land remaining. And, so much habitat has been destroyed for the natural flora & fauna. Change the status quo. For these 3.2 million acres of federal lands, I encourage you to be good stewards of that land. Save it for our future, rather than for a few cows & ORV users now. This short-sighted approach can only be equivalent to mismanagement of our natural legacy.

Mr Sykes, I implore you to protect our magnificent desert wildlands. Change the grazing levels & ORV usage NOW. We will all be losers if you don't.

Mr Sykes, please make it so.

Most sincerely,



Mary Ann Kruse
424 NW Federal Street
Bend, OR 97701
junehog@bendnet.com

DWAYNE SYKES, RMP TEAM LEADER
LAKEVIEW DISTRICT BLM,
HC 10 BOX 337,
LAKEVIEW, OREGON 97630

RECEIVED
JAN 16 2002
LAKEVIEW, B.L.M.

DEAR D. SYKES AND RMP TEAM:

I wish to comment on the Lakeview Resource Area Management Plan.

- ① Limit off-road vehicle (ORV) use across the entire jurisdiction of the Management Plan. No public lands should be open to the devastation caused by cross-country travel of ORVs.
- ② Exclude ORVs from the Sand Dunes Wilderness Study Area (WSA) and the Lost Forest Area of Critical Environmental Concern (ACEC) where they are currently wreaking havoc.
- ③ Close 500 miles of roads in Special Management Areas (WSA's, ACECs, and WSRs).
- ④ Close all roads in riparian areas.
- ⑤ Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- ⑥ Reduce grazing by at least 20% and exclude grazing from riparian areas entirely.

- ⑦ Close a high percentage of the management plan area to energy and mineral extraction.
- ⑧ Limit the number of Special Recreation Permits as needed to protect natural resource values.

Thank You.

Sincerely,

Larry R. Scofield
Larry R. Scofield

740 PARKER ROAD,
FALLS CITY, OREGON

97344

P.S. I recommend choosing Alternative C.

Dwayne Sykes
BLM- Lakeview District Office
HC 10 Box 337
Lakeview, Or. 97630

Dear Mr. Sykes,

Regarding the Lakeview Resource Management Plan, I urge you to reject Alternative D and choose a strengthened Alternative C that excludes livestock grazing and off-road vehicles from proposed wild and scenic rivers, critical fish and wildlife habitat, sage grouse leks, areas of critical environmental concern, wilderness study areas, and grazing allotments in "fair" or "poor" condition.

My family and I have kayacked the Warner Wetlands and hiked the Hart Mountain National Antelope Refuge. They are wonderful places that need to be protected from livestock grazing and off-road vehicles. BLM management of these lands must include objective standards and guidelines with constant on-the-ground management.

Lynn Krupa
23330 SW Casavant Dr.
Hillsboro, Or. 97123

cc: glyons@onda.org

January 17, 2002

Dwayne Sykes

BLM - Lakeview District Office

HC 10 Box 337

Lakeview, OR, 97630

Fax: 541-947-6399

Dear Mr. Sykes:

I am writing in regard to the Lakeview Resource Management Plan. I support the Alternative C option.

It excludes ORVs from the Sand Dunes Wilderness Study area and Lost Forest Area of Critical Environment Concern.

-Makes for some reductions in livestock grazing levels and most important, excludes livestock from all riparian areas.

It recommends Wild and Scenic River status for some 22 miles of three streams.

Adds 1,194 acres to four existing ACECs and 12 new ACECS.

- Closes a high percentage of the area to energy and mineral extraction.

It would be better to establish caps on livestock grazing.

Alternative C is not perfect but it is certainly preferable to Alternative D.

Sincerely,

Shirley Cameron

Shirley Cameron

35470 Ross Lane

Cottage Grove, OR, 97424

FAX: 767: 0820 (541)

January 15, 2002

RECEIVED

JAN 17 2002

LAKEVIEW, B.L.M.

Dwayne, Sykes
RMP Team Leader
Lakeview District, HC 10
Box 337, Lakeview, OR 97630

Re: Lakeview Resource Area Management Plan - Citizen Comment

Mr. Sykes, I would like my comments entered into the record for the Lakeview Resource Area Management Plan. Please choose Alternative C instead of Alternative D.

As I use this area for recreation myself, as do my friends and their families, we all feel that it should be managed in a way that protects and preserves many of its most important features that we enjoy the most.

It is very important to limit the use of ORV's (Off-Road Vehicles), as I can personally attest to the damage I have seen done by these vehicles. The Lakeview Resource Area in particular should ban all such ORV usage. I have a 4-wheel drive vehicle, but use it responsibly, and only on designated roads. It really angers me to see the damage done by these ORV's when I am so careful. This public land should not be for the private destruction of these irresponsible users. There are thousands of miles of trails and other locations throughout Oregon for these users--enough already!

Likewise, the Sand Dunes Wilderness Study Area (WSA) & the Lost Forest Area of Critical Environmental Concern (ACES) should also be protected, and ORV's should be excluded from using these sensitive and fragile areas.

All three streams in this area must also be protected, and it is my opinion that they should be afforded 'Wild and Scenic River' (WSR) status, and managed as if they were already. Let's try to protect what little remains of our great State's natural heritage by preserving these streams.

Grazing, which has had a terribly negative impact on the West for over 100 years should be severely restricted, or eliminated on these lands altogether. What right do ranchers have to devastate and degrade lands that belong to all of us? 100 years on the government dole is enough. It's time the rest of us got to use these lands, before they are permanently damaged beyond any salvation by the grazing interest.

Further, all roads in the Special Management Areas (WSAs, ACECs, and SWR.s) should be closed, as well as any roads in riparian areas.

Additional acreage should be added to the WSA's (1194 acres); 20,000 acres

to the four existing ACECs, and 130,000 acres to the 12 new ACECs.

Most of this area should be closed to energy and mineral extraction. These activities can only further lead to misuse and abuse by these notoriously poor stewards of the land. It is not worth risking further damage by letting this type of activity take place here.

Finally, the number of Special Recreation permits should be limited as needed to protect the natural resource values evident throughout the Lakeview Resource Management Plan area.

Thank you very much for your time and consideration.

Regards,

George B. Hug

George B. Hug
487 North Fifth St.
Creswell, Oregon 97426
(541) 895-3216

January 13, 2002

Mr. Dwayne Sykes
BLM- Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

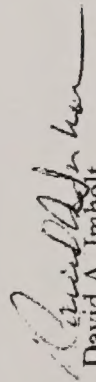
Dear Mr. Sykes:

I am writing you in regard to the draft Lakeview Resource Management Plan.

As an Oregon resident for over 50 years, including several years in eastern Oregon working for the US Forest Service, I have had many opportunities to see the severe damage done by cattle grazing to both public and private lands. The potential damage that can be done by off-road vehicles is extreme.

Your proposed Alternative D does little to help the land begin to heal. I would strongly urge you to adopt Alternative C. While it is not perfect, I think it would begin the long process of bringing the land back to an acceptable condition.

Sincerely yours,


David A. Imholt
26761 S. Fish Road
Mulino, OR 97042

LAKEVIEW, BLM.

... 17 JAN

RECEIVED

P.O. Box 6886
Bend OR 97708
January 15, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview OR 97630

Dear Mr. Sykes,

We are writing in support of Alternative C in the Lakeview Resource Management Plan. As we understand it Alternative C would exclude livestock grazing and off-road vehicles from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, ACECs, WSAs and grazing allotments in "fair" and "poor" conditions.

We like to think we have basis from which to voice our opinions. Dallas has lived in Frenchglen as a teacher and outdoorsman, buckarooed with ranchers (eg-Taft Miller) in the Catlow Valley and, together with Kathy, has spent more than three decades traveling to southeastern Oregon to hunt, fish, camp and enjoy the seclusion and serenity of the High Oregon Desert. We are not writing this from our living room in the Willamette Valley and compel ourselves to write because our one trip a year will be tainted. Rather, we appreciate and spend time on the outdoor trail regularly and have formed opinions based upon our experiences, education and common sense.

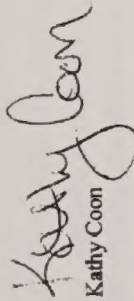
We have participated in sage grouse hunts for more than a decade and have witnessed the decline in habitat for these birds, as well as increased difficulty in locating them. In 2001 we hunted the Warner unit and stopped at several areas that appeared denuded from grazing. A stark example was our stop at the Foley Creek area. There were NO grasses to the south of the road and no sign of small animals or any type of birds. If the sage grouse were to get on the Endangered Species List that would be sad due to the reason (low numbers, endangered), but we would prefer to not hunt and see a bird rather than hunt birds that don't exist or are on the verge of disappearance.

If ranchers would demonstrate their ability to manage grazing by moving stock and allowing low ratios only in the field we would have more faith; and more signals and action from BLM demonstrating a strength in management of livestock programs that minimize destruction, even temporary destruction, to the environment as it is. To take the initiative to regain some of the habitat that once covered the area would be even better.

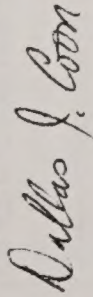
Alternative C takes a step in reducing destructive traffic on over two million acres that Alternative D fails to close off. Off-road vehicle drivers, in general, damage any area on which they drive (as do cars), and some drivers take free reign in their trips and destroy animal homes, feed and environment. And, if you happen to be in the same general area, the noise pollution is so distracting the reason why one is out there is lost. At minimum please exclude ORVs from the Sand Dunes Wilderness Study Area, Lost forest Area of Critical Environmental Concern and the hundreds of miles of roads specified in Alternative C.

Basically, both Alternative D and C merely slow the continuing and inevitable destruction of the environment as it was. You and we all know that the total elimination of cattle grazing and off-road vehicle usage in the whole High Oregon Desert would create a much better environment for all native species. Sage grouse is one excellent case in point.

Sincerely,


Kathy Coon

Dallas Coon


Dallas J. Coon

L-43

January 14, 2002

LAKEVIEW, B.L.M.

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

JAN 17 2002

RECEIVED

I'd like to comment on the Lakeview Resource Management Plan:

I'm asking you to reject **Alternative D**, and instead adopt **Alternative C**. This isn't just about "stupid city people" not knowing about or understanding the issues. Having spent many weeks exploring Lake and Harney counties over the past 30 years, I've seen first hand the damage done by unrestricted grazing and ORV abuse, so I know about and understand them well.

I'm tired of the BLM's business-as-usual attitude concerning the management of their lands. This isn't the 19th century anymore. I wish that just for once, the BLM would decide to do the right thing and put the health of the land ahead of the interests of the extractive industries and motorized vehicle recreation. But it seems like the BLM is incapable of doing that.

The issue is all about "balance", and "balance" is subjective. Yes, you need to accommodate conflicting interests. And yes, multiple use is possible. But the bottom line is not to sacrifice the long-term health of the land, the wildlife, and the rivers. The BLM lands of Lakeview and Harney counties need more protection than they're currently getting, or would get under **Alternative D**. The BLM needs to protect more roadless areas, designate more rivers as Wild and Scenic, and eliminate cattle grazing from sensitive areas such as wetlands and riparian areas.

Please take the long view, and consider doing the right thing this time. Future generations will thank you for it.

Thanks for the opportunity to comment.

Bob Atiyeh
19341 Suncrest Drive
West Linn, OR 97068

HARRY F. BREVOORT
1350 HIDDEN CREEK DRIVE NE
KEIZER, OREGON 97503

RECEIVED
JAN 17 2002
LAKEVIEW, BLM.

Jan. 16, 2002

Dwayne Sykes
BLM- Lakeview District Office
HC 10 Box 339
Lakeview, OR 97630

Dear Mr. Sykes:

It is my understanding the Bureau of Land Management is now seeking public comments on its Lakeview Resource Management Plan that will guide the management of 3.2 million acres of federal lands over the next 20 years. This study is designated as Alternative Plans A,B,C,D, & E.

It is my further understanding that BLM has selected Alternative Plan D, which aims to "protect natural values while providing commodity production", whatever that means. Frankly, such a broad definition certainly needs a lot of interpretation in an effort to determine just what your goals really are.

Here we are in the 21st century, and after over 150 years of livestock destruction of our pristine western landscapes your Alternative Plan D fails to call for the reduction of livestock grazing for the next 20 years !! Incredible!!

In addition, your Plan D leaves the overwhelming majority of the planning area {over 2 million acres} open to off-road vehicles. With the fantastic increase of the public's buying ORVs, how can you possibly recommend leaving the 2 million acres open for the next 20 years for them to destroy?

Of the five Alternatives it would appear Alternative Plan C would be the least destructive, even though it fails to set reasonable caps on livestock grazing and allows the limited use of ORVs on more than three million acres of the planning area. Under this Plan I would strongly urge you to seriously consider a greater reduction in livestock grazing levels.

Also, a sharp reduction of ORVs should be included in this Plan in an effort to slow down the continued destruction they do to any off-road land they traverse. Another item that should be included in this Plan is to close a high percentage of the area to energy and mineral extraction.

In the strongest words possible, I urge you to abandon Alternative Plan D, and in its place choose a strengthened Alternative Plan C that would give better protection to a more reasonable and sensible Lakeview Resource Management Plan.

L-45

HARRY F. BREVOORT
1350 HIDDEN CREEK DRIVE NE
KEIZER, OREGON 97303

I would appreciate your placing my name on your mailing list so I may continue to follow any action taken on your Lakeview Resource Management Plan.

Yours very truly,

A. F. Brevoort

June 16, 2002

Dwayne Sykes
Bum Interview Dist. Office
HC 10 Box 337
Interview, OR 97630

Mr. Sykes,
I am writing today regarding the
Interview Resource Management Plan.
I want to urge the BLM to reject
alternative D and instead choose
a strengthening alternative.

It's finally time to get serious about
protecting Oregon's Desert Wildlands
from livestock grazing and off road
vehicles. I am also concerned about
"adaptive management" on which
plans depend. It is not a substitute
for regular on-sight monitoring and
BLM is not equipped for the on sight
type of management. The areas of
concern may only get worse without
regular monitoring.
I have hiked and camped in parts
of this area with some of the areas
already compromised - it really needs
more attention. Excluding grazing and
off road vehicles in the area of
concern could be the answer.

Therefore, have you do the right
thing - enforce attendance

Thank you

Connie Lonsdale

PO Box 2319

Waldport, OR 97397

RECEIVED
JAN 17 2002
LAKEVIEW, B.L.M.

Dwayne Sykes
BLM Lakeview District Office

Dear Mr. Sykes:

I understand that you're accepting public input prior to making a final decision on the Lakeview Resource Management Plan.

Twenty years is a long time and if proper decisions aren't made - changes can occur that will be hard or impossible to reverse.

I hope that you can:

- 1) Reduce off road vehicle use as much as possible - it damages the land and reduces the quality of outdoor experience for those of us who like to walk.
- 2) Reduce cattle grazing - at least make the ranches where they are used so they don't overgraze an area.

Thanks /
Pat L. Conner

January 15, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview OR 97630

Dear Sirs,

As a citizen of Oregon, I urge you to reject Alternative D of the Lakeview Resource Management Plan, and instead support a strengthened Alternative C that would exclude livestock grazing and off-road vehicles from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, Areas of Critical Environmental Concern, Wilderness Study Areas, and grazing allotments in fair or poor condition.

The "adaptive management" that Alternative D relies on is no substitute for objective standards and guidelines, and will lead only to further resource degradation, due mostly to the logistical impossibility of constant on-the-ground monitoring by your unfortunately understaffed organization.

Let us save at least some of Oregon's magnificent desert regions to be enjoyed by our children's children.
Thank you for your time.

Lawrence Pagen
25590 Bellfountain Rd
Monroe OR 97456

Mr. Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, Oregon 97630

Dear Sir:

The following are comments on the Bureau of Land Management's Draft Lakeview Resource Management Plan/Environmental Impact Statement:

1. I favor the selection of Alternative C. This alternative, with several noted exceptions, is the most favorable for wildlife, yet will still allow for the continuance of a viable economic livestock operation.

49-1 I 2. I recommend changing "resting re-seeded areas from cattle grazing" from 2 to 3 years.

49-2 I 3. Increased use of law enforcement to keep livestock from rested and re-seeded areas needs to be addressed.

4. Use management strategy presently found in Alternative B, "Identify and delineate riparian conservation areas for management" in whichever alternative is selected.

4. Use management strategy presently found in alternative C, "From a watershed perspective, uses or activities would be allowed if they have no effect on riparian conservation areas, or if they promote progress toward attainment of proper functioning condition and riparian management objectives", in whichever alternative is selected.

49-3 I 5. There is a need to adequately protect important riparian areas for wildlife (most of which are important). Many riparian areas on Beaty's Butte Allotment have been observed with no adequate protection from livestock and wild horses. These areas have been severely degraded for wildlife use. These areas need to be identified, acknowledged, and addressed in this Draft Plan.

49-4 I 6. Playa lakebeds are very important wildlife habitats where wildlife find and use succulent and protein-rich vegetation during critical periods of drought. These areas deserve special protection and management. Many of these habitats are also used by aquatic birds, not only for food but for nesting cover. Many of these areas, in total or partially, should receive special protection from livestock and wild horses. We are not aware of any of these areas being protected at the present time. Plans for protection should be addressed in this Draft Management Plan.

7. The management strategy presently found in alternative C, Remove all roads from riparian conservation areas", should be used in whichever alternative is selected.

49-1: The policy (as stated in BLM Memo 88-547, July 8, 1988, Emergency Fire Rehabilitation Guidance) for resting disturbed areas from livestock grazing (by any kind of disturbance such as fire, rehabilitation, chaining, disease, etc.) or reseeded areas is a minimum of two growing seasons. That means that in some areas, after evaluation, areas could require longer rest. *Two growing seasons* is defined as one full growing season (one calendar year) plus the next growing season until the grasses set seed (usually in mid- to late July in the LRA). This demonstrates the amount of time that the seeded plants have to grow and develop roots in order to survive. This rule of thumb appears to work in most cases, especially when the rested area is visited and evaluated before turnout.

49-2: Rested pastures and areas that are closed for rehabilitation are observed on a regular basis to ensure compliance with grazing authorizations and closure notices.

49-3: Most of the springs and associated streams in the Beaty Butte Allotment, and many on private land, have been excluded from livestock use. Where the exclosures have been effective at controlling use, riparian conditions have improved. Many other springs and water sources in the Beaty Butte area are on private land, and their management is outside the scope of the RMP. There may be some room to expand protection on BLM sites, but these specific sites cannot be described without going into project-level planning. There is adequate ability to protect and manage these areas under the goals and objectives in the plan.

The RMP is not the document where individual riparian areas are identified and management plans developed. That level of work is done at the project or activity plan level; however, we do want to respond to your concerns about riparian areas on the Beaty Butte Allotment.

8. The management strategy presently found in alternative C, "Manage livestock grazing to promote healthy watersheds which include protecting soil, native vegetation, and biological crusts. Prohibit management activities and uses, except when mandated by law, in perennial and intermittent drainages where such activities would adversely impact watershed function or processes", should be used in whichever alternative is selected.

49-5

9. The statement, found in alternatives B, C, and D, "Livestock grazing use within crucial deer or pronghorn winter range would not be allowed to exceed an average of 30% removal of current years growth of browse", does not take into consideration the need for pronghorn to have an adequate amount of forbs on winter ranges. Current research supports the idea that pronghorn require a high amount of forbs in their winter diet. This can only be achieved by severely reducing livestock grazing during the summer on important pronghorn winter ranges within the LRA.

49-6

10. Concerning the concept addressed in this Draft Plan on management for individual wildlife species versus a landscape scale/ecosystem approach: Not only should BLM emphasize management that fosters plant/animal community health integrity and landscape level issues, but emphasis should also be placed on individual species management for some species. It takes both approaches, not one or the other. To ignore habitat requirements of some individual species would result in possible serious habitat degradations for many species with specific habitat requirements. This is especially true for several sagebrush steppe species, including Pygmy rabbit, sage grouse and seasonal pronghorn ranges (winter and fawning), to name a few.

49-7

11. Prescribed fire is an important management tool for wildlife that depend on increased forb production and regenerated sagebrush as an outcome. However using "acres" as an objective for prescribed fire management is not an acceptable scientific method for establishing goals and objectives for habitat management when wildlife is an issue. The need for prescribed fire in sagebrush habitats should be based on evaluations of 1) present percent canopy cover of sagebrush, other shrubs, forbs, and grasses; 2) age of the sagebrush stand, 3) successional stage, 4) habitat type, ie. low sagebrush versus mountain sagebrush, 5) chances of successful regeneration of sagebrush; 6) present and potential uses of wildlife; 7) etc. Only then, can goals and objectives for use of prescribed fire be addressed.

12. When anticipating use of prescribed fire, and regeneration of sagebrush is a desired goal, methodology and chances of successful regeneration of sagebrush should be addressed in the Draft Plan, which have not. Such factors as size of burn, burning pattern (ie. mosaic), species of sagebrush, and overall long-term goals of burning sagebrush needs to be more specifically outlined. These goals need to consider not only overall plant/animal species diversity, but individual species of many important wildlife species.

13. In alternative C; "burning 50% of the LRA in a 10 year period", is in excess if sagebrush steppe is to be maintained to support wildlife dependent upon this habitat. Not in excess of 15% in a ten year period, would be more appropriate. (Also see #11 concerning using acres).

14. Forage allocations (AUM'S) for wildlife is a meaningless and deceptive concept and should

The grazing system on the Beauty Butte Allotment is a rest-rotation system that prevents season-long grazing on riparian areas in consecutive years. The common pasture makes up 80 percent of the allotment and has been divided into two parts so that half of the common pasture is rested every year, which protects many of the riparian areas on the allotment from cattle grazing each year. The west side pastures make up about 10 percent of the allotment. There is a rest-rotation system that rests one of the four pastures every year and rotates the grazing between the others during the season. The large riparian area around Guano Lake is only grazed in the fall after the growing season.

There are 43 developed spring sites on the Beauty Butte Allotment, 23 of which are on public land. Eighteen of the spring sites on public land and 16 on private lands have exclosure fences around the spring that protect the riparian areas. The size of the exclosures vary from protecting only the spring source to exclosures that include over 20 acres of riparian area.

For more detailed information about management on the Beauty Butte Allotment, please refer to the Beauty Butte Allotment Management Plan (USDI-BLM and USDI-USFWS 1998a, 1998b).

49-4: We agree that playa lakebeds are very important to wildlife requiring succulent and protein-rich vegetation during critical periods of drought—especially for greater sage-grouse and pronghorn during periods of their critical growth and development. There are a few playa lakebeds excluded from domestic livestock grazing and wild horse use to protect sensitive plant species. We also have plans to allow no new playa lakebed development and to explore the feasibility of lakebed restoration. We also have been told that ODFW would be willing to participate in that restoration. When completed, the long-range conservation plan for greater sage-grouse should guide us on our future playa lakebed management and would amend this RMP, if necessary. Until that time, we will analyze grazing impacts on a case-by-case basis during the allotment evaluation process.

49-5: We agree that forbs are a major component in the diets of pronghorn antelope most of the year. Pronghorn antelope winter ranges vary from one winter to the next depending on snowfall patterns. Most of the wintering areas occur on crested wheatgrass seedings and low sagebrush areas. Crested wheatgrass seedings are generally not grazed in the summer months, allowing summer forbs to develop. Low sagebrush is grazed in the summer months, but it is grazed lightly enough that forb development is probably not heavily impacted by cattle.

49-6: We agree that sound wildlife management should be a two-pronged approach. Some focus is necessary for specific species that seem to be declining. However, single species management should not override the focus that is necessary on the larger landscape level to promote healthy functioning landscapes. If landscapes function properly, this will benefit most declining species.

be deleted, both in the Plan and in thought. For example, pronghorn utilize little grass but are highly dependent on forbs. The allocation of AUM'S could mean that 100% of the allocation is in grass species, sounding good in theory, but being, in reality, detrimental. If AUM'S could be allocated separately for grass and forbs, this would be at least would be a start. Allocating AUM's for such species as elk and bighorn sheep would be more appropriate, but only if it could be done on a very site specific basis, which this Plan does not.

Summary: The Draft Management Plan/EIS for the Lakeview Resource Area is not adequate in addressing the needs of wildlife. Site and species specificity, including specific management goals and objectives for wildlife and wildlife habitats, are found to be not adequate when addressing wildlife needs. Without this specificity, monitoring will not result in the knowledge when management goals are met. The assurance of the public and wildlife professionals that step-down plans will incorporate these concerns will not be enough to assure that wildlife needs will be met in this Plan. You are encouraged to alter the Draft Plan to incorporate these issues and concerns.

Thank You for the opportunity to comment.

Sincerely, *Mike R. Dunbar*

Mike R. Dunbar
18734 Westside Rd.
Lakeview, OR 97630

49-7: In order to plan and evaluate prescribed fire, some measurements need to be made; the BLM reports those actions in *acres*, as directed by the Washington Office. Acres are not an objective, nor are they how goals are established for habitat management, especially for wildlife. Every prescribed fire plan goes through the NEPA process, which evaluates the following: proposed size of burn, burning pattern, soils, canopy cover, fuels, structure of shrub stand (rather than age classes, except in areas of old growth juniper), seral stage, habitat type, wildlife values, presence or absence of cheatgrass and noxious weeds, and other parameters. ODFW is always included in the decision process, and in the future, Tribal peoples will also be included. This analysis has been done in the past and is being done now by the resource area. However, in analyzing the resource area as a whole, acres have been estimated that meet criteria for the need of prescribed burning.

When analyzing an area for prescribed burning, the ecological site potential, based on soil type, is considered when developing specific burn plan goals. Regeneration of sagebrush could be a goal, especially in areas of crested wheat seedings or extensive stands of cheatgrass; however, mechanical methods are more likely to be used for that process. Most prescribed fires are intended to create a mosaic of mixed plant communities, and sagebrush would need to be reduced to meet that objective. After wildfire, we would analyze the possibility and plausibility of planting sagebrush as part of the rehabilitation process. Aerial planting of sagebrush will be done in the winter of 2002 on the Juniper Mountain wildfire (2001) rehabilitation area.

Acres represent the reporting unit that fire management and several resource activities are required to use. Treatments are carefully planned by an interdisciplinary team of resource specialists to ensure that possible environmental effects (i.e. wildlife values) are considered in project planning and implementation.

Since the 1870s, several factors have contributed to the expansion of shrubs in the American West. Wildfire prevention, introduction of livestock into the rangelands (sheep, cattle, burros, and horses), climate fluctuations, and inadvertent introduction of cheatgrass, have all changed fire frequency patterns and contributed to the expansion of juniper, mountain mahogany, bitterbrush, and sagebrush into areas that were predominantly grasslands (Gruel 1995; Miller and Rose 1999). These dynamics are considered, along with plant/animal species diversity, in the process of planning prescribed fire projects.

Treating up to 10 percent (320,000 acres), 50 percent (1,600,000 acres) and 35 percent (1,120,000 acres) of the resource area in the next 10 years are acreage figures used to give broad proposed figures for NEPA analysis of the alternatives. Refer to page 3-48 of the Proposed RMP/Final EIS, Management Common to All Alternatives. The acres listed in the alternatives are upper limits used for impact analysis purposes, not proposed targets. Treatment acres refer to the total area analyzed in a given project area NEPA analysis. It does not assume that 100 percent of those acres are treated (burned, mowed, chainsawed, sheared, etc).

49-8: Forage allocations (AUM's) for wildlife are somewhat misleading, but the numbers highlight wildlife use within a given allotment. Table 2-26 depicts existing and proposed changes to wildlife allocations. Forage allocations are made based on the dietary preferences of cattle and do not necessarily reflect the food resources available for wildlife consumption. The existing allocations were completed 20 years ago and do not represent the current distribution of wildlife within the resource area. Mule deer and pronghorn use has changed since the original allocation. Elk and bighorn sheep have expanded into new ranges. The Other Wildlife category will be modified to reflect not only raptors, small mammals, and birds, as originally designed, but will also consider important shrub-steppe species, such as greater sage-grouse. Wildlife allocations (in AUM's) would only be used for purposes of species use. Identification of potential conflicts between wildlife and domestic livestock use will be evaluated during the rangeland health assessment or allotment evaluation process.

RECEIVED

JAN 18 2002

LAKEVIEW, B.L.M.

1-15-02

Dear BLM,

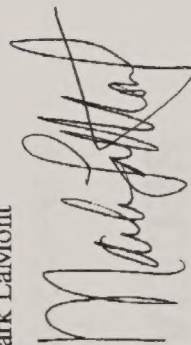
This letter is written in opposition to your potential selection of Alternative D in the Lakeview Resource Management Plan. I support Alternative C with emphasis on protection of riparian areas, exclusion of ORV use in Wilderness study areas, Dunes, Areas of Critical Environmental Concern, and the Lost Forest.

I am also highly concerned that Alternative D does not reduce livestock grazing -- at all. I understand that livestock grazing is important and is a tradition on public lands. However, a practices' merit rest on whether it is rational and protects the land for all our children, not on it's value as a tradition for a minority. There are millions of acres suitable for grazing. Riparian areas, and fragile natural areas are not suitable.

My concerns come from spending much time in areas like the Malheur Game Refuge. Often, the dominant and most prominent animal on the refuge is the cow. That strikes many people as a bizarre fact. Those animals need to be grazed elsewhere -times have changed -- people understand the impact of grazing and balance is possible. Alternative D does not provide enough of a balance. Cattle grazing needs to be brought further into the modern age and in line with the conservation goals of many citizens. I recommend Alternative C.

Sincerely,

Mark LaMont



Prineville, Oregon
1/15/02

Dwain Sykes

BLM Lakeview District Office

HC 10 Box 337

Lakeview, Ore. 97630

LAKEVIEW, B.L.M.

JAN 18 2002

RECEIVED

Comments on Lakeview Resource
Management Plan:

Virtually all of the public lands
in the resource area remain both
economically and ecologically unsuited
to livestock grazing.

I strongly urge you to reject
Alternative D. Any plan short
of a much improved Alternative
C would be shortsighted akin to
mismanagement.

Harold A. Kinegar
947 E. 1st
Prineville, Ore. 97754

LAKEVIEW, B.L.M.

JAN 18 2002

RECEIVED

January 16, 2002

Bureau of Land Management
HC10
Box 337
Lakeview, OR 97630

Re: Lakeview Resource Management Plan/Environmental Impact Statement

I would urge support for the Alternative A : no change in management

While I do not agree completely with this plan, it will keep the land in the public use domain. I am greatly concerned about the reliability of the studies done in this area.

In September of 1999 we were in the Sage Hen Springs area while the field scientist from OSU were doing their impact statements. I talked to the two young men about the study and they explained their methodology to me. This fall was one of the historically driest years in recorded history. I don't think it was by accident that this was the year chosen to initiate said study. After finding the Lynx Studies intentionally flawed I think Bureau of Land Management has a responsibility to reevaluate past studies before putting any more land into Wilderness Studies, Wilderness Areas, Environmental Concerns Areas, RNA, or Wild River Areas.

Oregon's economy has been devastated by well heeled Environmental Groups with little regard for realistic solutions.

Sincerely,

James Nork
Alice Nork
James & Alice Nork



U.S. Department of the Interior
Bureau of Land Management
Lakeview Resource Area
Lakeview, Oregon



Public Meeting for Lakeview Draft RMP/EIS

LEAVE COMMENTS AT REGISTRATION TABLE OR FOLD, STAPLE, AND MAIL.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Lakeview BLM Office, 1300 South G Street, Lakeview, Oregon during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: James C. Lynch
Address: P.O. Box 351, Lakeview, Oregon Zip Code: 97630
Comments: Of the 5 alternatives, the best one is "C" due to the economic needs of Lakeview and Klamath Counties. The next best alternative is "A". If alternative "D" is selected, no additional road closures should occur. However, the treatment of invasive juniper stands is highly desirable, it not imperative before additional productive ground is permanently damaged. The wild horse herds should be reduced to the minimum and not allowed to increase. They add nothing to the area, are not "native" to the area, are not endangered, and are just an added expense and nuisance to control. They Warner sucker should either be delisted or a truly scientific study made to determine if they are in fact, threatened.

Signature: James C Lynch Date: Jan 19, 2002

53-1

53-1: The "Wild Free-Roaming Horse and Burro Act" (Public Law 92-195) mandates managing wild horses where present since the 1972 Act was passed.

53-2

53-2: Delisting a species is not in the BLM's authority and is outside the scope of this plan. However, the species may be delisted when the requirements presented in the "Recovery Plan for the Threatened and Rare Native Fishes of the Warner Basin and Alkali Subbasin" (USDI-USFWS 1998) pertaining to the Warner sucker, are met. Meeting the requirements for the recovery plan on BLM-administered land is a goal common to all alternatives in the RMP. While there has been improvement in stream conditions since listing, many of the factors that led to the listing are still present. There has been substantial research accomplished since the listing, none of which indicates that the species should not be listed. For example, there is still no consistent connectivity between the lakes and spawning streams in the Warner Valley.

1-16-02

Dwayne Dykes
B.L.M. - Lakeview District Office
HC 10 - Box 337
Lakeview, OR-97630

RECEIVED
JAN 27 2002
LAKEVIEW, B.L.M.

Dear Mr. Dykes,

This letter concerns the Lakeview Resource Management Plan which will set the management agenda for 3.2 million acres of federal lands over the next 20 years.

I truly understand the work and pressures involved in putting together a plan of this magnitude.

I have travelled through south-central and south-eastern Oregon during the last 40 years and have seen the deterioration of the wildlife habitat. It has been enormous.

Drought years have taken a heavy toll on all our public lands. Overgrazing has devastated some areas.

History tells us that humans will destroy everything they touch through greed and ignorance. The poor conditions of these public lands confirm this.

On the subject of livestock grazing on public lands, all you need to do is read "Sacred Hours at the Public Trough" by Dornyl and Nancy Ferguson. It explains it all. The political pressures on you and other dedicated employees of BLM should not set the agenda over what you know is the right way to manage these fragile lands for the long term.

About the only thing we can leave this world with is our good name and reputation. The BLM and some of their employees who give in to the pressures of the livestock people and the mining and ORV interest will not go out with a good name and reputation.

I encourage you to seek, and strengthen alternative management plans to protect the fragile ecosystems and wildlife habitat on these public lands.

The present and future generations are depending on people like you try and save our lands from the human greed and ignorance that has destroyed so much of our natural and wild lands.

Respectfully yours,

Robert L. Kern
62425 Owsley Canyon Rd
La Grande, OR - 97850

Carrie Roose
65705 White Rock Loop
Bend, Oregon 97701

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

January 18, 2002

Dear Mr. Sykes,

Your Lakeview Resource Management Plan is a very impressive document. Your agency's "adaptive management" plan is no substitute for objective standards and guidelines. I have seen the results of ORV use on the Ft. Rock OHV trail system. The resource damage, vandalism, law enforcement activity, garbage and human caused fires are increasing each year due to this impact. Your district most likely is experiencing the same problems. The money generated to create this "playground" is no longer there; thus on-the-ground monitoring is understaffed with no one claiming accountability.

I have concerns about the unique and fragile environment of the Lost Forest and would like to see an exclusion of ORV use. This group of recreationist--along with cattle--are getting out of hand. Tax payers money is being spent to subsidize the grazing allotment fees and to perpetuate millions of dollars in damage promoting ORV "kingdoms".

Your Alternative C is a much more realistic goal. Protecting 3.2 million acres for future generations (and present) is a standard all government agencies need to try a little harder to strive for.

Thank you ,

Carrie Roose

Andrea S. Vargo
907 NE Thompson
Portland, OR 97212
503-287-5949

January 14, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to you today to comment on the Lakeview RMP that I understand will guide the BLM for the next 20 years.

Of the Alternative Plans you are considering, I highly support a strengthened Alternative C because of the critical areas that it excludes livestock grazing & off-road vehicles from.

I urge you to reject Alternative D. These wild areas need considerably

more protection + critical attention
than Alternative D would provide.

Please, please choose a
strengthened Alternative C.

Sincerely,
Andrea Vargo

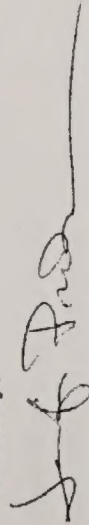
January 15, 2002

Dear Dwayne Sykes,

Hello, I am concerned that BLM will choose Alt D instead of Alt. C concerning the Lakeview Resource Area Management Plan. As a person who loves OR and its beautiful forests, mountains and uninhabited quiet places, I think you'd be doing a great disservice to the state and the people who choose to live here by taking away a key component to the quality of life many enjoy here.

Please limit or deny off road vehicle's-ORV 's- use across the entire Lakeview Resource Area. Public lands are not for crazies to destroy. Please exclude ORV's from the Sand Dunes Wilderness Study area and Lost Forest Area of Critical Environmental Concern where they have already done damage. Please recommend WSR status for 3 streams and treat them as such. Please close 500 miles of roads in WSAs, ACEC, and WSRs. Please close all roads and exclude grazing in riparian areas. And though I want to enjoy these areas and feel everyone should have a right to, these areas are becoming less and less and so whatever it takes to keep these protected areas healthy. Please limit the number of Special Recreation Permits to protect these beautiful places from their admirers. Thanks for listening, I hope you can be swayed by my pleas!

Sincerely,



Jennifer Prokos

612 NW 20th Ave. #3
Portland, OR 97209

503 .228. 1281

LAKEVIEW, B.L.M.

JAN 20 2002

RECEIVED

18 January 2002

To: Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

LAKEVIEW RESOURCE
MANAGEMENT PLAN

Dear Mr. Sykes,

I have not read your proposed resource management plan for the Lakeview area but do have the summary from the Oregon Natural Desert Association. I realize that this represents a biased viewpoint, but I generally agree in principle with their ideas and proposals.

I have two major concerns that I hope you will consider; the destruction of the environment by reckless off road vehicular activity, and the detrimental effects of cattle grazing in sensitive areas.

Off road vehicular driving is generally a destructive form of recreation which reinforces the tendency for destructive behavior in the individual. The BLM is not in a position to ban off road driving but you can restrict it to identified pathways in areas that are somewhat insensitive to this activity or to areas where this activity has already considerably disrupted the environment. The shortage of law enforcement personnel in the BLM has been a problem in controlling off road vehicular activities. Perhaps this could be mitigated by volunteer citizen groups who would monitor specific areas and report violations to the BLM. Whatever you do, please keep this activity away from such areas proposed wild and scenic rivers, critical fish and wildlife habitat, sage grouse leks, areas of critical environmental concern, and wilderness study areas.

Grazing cattle on rangeland has been giving way to cattle feeder lots in most states where raising cattle is a major industry. We no longer have the same needs to raise the maximum number of cattle that was perceived in the 1930s when the Taylor Grazing Act was enacted. In addition, the attitude of the public is changing to one of preferred restoration of significant portions of public lands to a more natural environment and the maintenance of that natural state. The terrorist acts of 11 September 2001 have awakened the public to the need for spiritual renewal that nature can provide. This has a far greater value to a far greater number of people than grazing livestock on public lands. This doesn't change the laws that govern the activities of the BLM, but surely you can restrict grazing from lands deemed to be in fair or poor condition and from the same areas that I recommend being restricted from off road vehicular activity.

The BLM has been severely criticized by environmental organizations for a perceived lack of sensitivity to the environment. It is my perception that the BLM has been showing an increased sensitivity towards the environment within the context of the laws

that govern your activities. I encourage you to continue to increase this sensitivity in the final preparation of the Lakeview Resource Management Plan.

Capitalism and free enterprise have provided us with the most beneficial economic system in history. Its very success has created a problem in valuation in the sense that the only calibrated system of evaluation is measured in terms of money. We have no calibrated value system in terms other than money that could be weighed against the value of money to make a final determination for decision making. How do you measure the value of good music, beautiful artwork, a breath-taking view of the landscape; the surge of renewed hope and refreshed spirit from these and compare it to the dollars that grazing, extracting natural resources, or recreational activities of all sorts brings to the government.

If you are forced to do your evaluation only in terms of dollars gained, please do it on a full cost accounting basis. On this basis, most of the enterprises aimed at the public lands would fail.

Sincerely yours,

Gordon K. Baker

Gordon K. Baker
60773 Willow Creek Court
Bend, Oregon 97702
E-mail: gbaker@bendcable.com

1440 NE Richard Lane
Madras, Oregon 97741
January 18, 2001

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to express my support for Alternative C of the Lakeview Resource Management Plan. I feel that Alternative D does not adequately protect the resources which I will discuss in this letter.

Limit ORVs: Over the years I have witnessed an ever increasing path of destruction and erosion caused by ORV use. These environmentally unfriendly vehicles have no place on public lands except perhaps in very carefully monitored limited situations where it has been determined that resource damage will be minimal and they are made to stay on designated trails for their use. In the event that regulations are not adhered to these areas should also be closed.

No ORV use in the Sand Dunes Wilderness Study Area and the Lost Forest Area. ORVs are presently wreaking havoc on these fragile areas.

Wild and Scenic River Status: The three major streams in the area should be protected and managed to maximize resource and wilderness values.

Close many existing roads: Many of the roads in the Special management areas should be closed to maximize protection of wildlife, reduce erosion and protect crucial riparian habitat.

Additional Land Added to Special Management Areas: 20,000 acres should be added to the four existing ACECs and another 130,000 acres should be added to 12 new ACECs. I place a high value on low impact recreation such as hiking, fishing and hunting on foot.

Grazing should be excluded from all riparian areas and reduced from current levels. Reduced grazing will lead to better forage and increased numbers of native grazers and browsers.

Close a large portion of the area to energy and mineral extraction.

Limit the number of Special Recreation Permits as needed to protect natural resource values.

Sincerely, Chris Scranton

865 Shalar Court
Eugene, Oregon 97405-2313
January 17, 2002

Dwayne Sykes
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes:

I am writing with respect to the Lakeview Resource Management Plan currently being developed for some 3.2 million acres of federal land in south-central Oregon.

It is my understanding that of the five alternative plans that have been developed, the preferred alternative of the Bureau of Land Management is Alternative D. I would urge you to reject Alternative D, and instead to proceed with Alternative C, preferably in a somewhat strengthened form.

Alternative D calls for "adaptive management," a strategy that has not worked in the past. Moreover, Alternative D fails to reduce highly destructive livestock grazing, and leaves the bulk of the planning area available to off-road vehicles. It is predictable that Alternative D will lead to severe degradation of the biological integrity of the landscape.

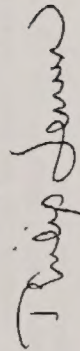
Alternative C as proposed is much to be preferred to Alternative D. Alternative C makes a reasonable effort to maintain the ecological integrity of the planning area by limiting livestock grazing and off-road vehicle use.

In addition, though, Alternative C can be improved by excluding livestock grazing and off-road vehicle use altogether from proposed Wild and Scenic Rivers, from areas of critical fish and wildlife habitat (including mating areas for sage grouse), from Areas of Critical Environmental Concern, from Wilderness Study Areas, and from areas that are already degraded from overgrazing.

I urge you to adopt a strengthened version of Alternative C as the preferred management option for the Lakeview Resource Management Plan.

Thank you for your attention. I look forward to hearing from you.

Sincerely,



Philip Lewin

RECEIVED
JAN 27 2007
LAKEVIEW, B.I.

Loren E. Anslow
2800 S.E. Hogan Rd.
Gresham, OR 97080
503-665-8318

Dwayne Sykes RPM Team Leader
Lakeview District,
HC 10 Box 337,
Lakeview, OR 97630

Dear Mr. Sykes:

In regard to the Lakeview Resource Area Management Plan, I am writing this letter to ask you, as leader, to choose an alternative C instead of D. It seems to me the people of the State of Oregon need to protect and preserve as much wild land as they can, not allow off-road vehicles to tear up the land-scape doing irreparable damage to what might have been an unusually pictorial piece of our natural heritage. There really should not be any (ORV) use permitted in any of the wild and beautiful lands of the Lakeview Resource Area. This should be an Area across which NO (ORV) tracks are permitted at all!

We should be especially careful about the preservation of riparian areas, where no cows at all should be permitted. Grazing, harmless though it may appear to be, is VERY hard on desert-type land. We should reduce grazing by at least 25%, and keep those silly cows out of riparian areas altogether.

All of the rivers and creeks in the area should be classed Wild and Scenic (WSR) and be protected under those rules.

I understand there is an area called the Sand Dunes Wilderness Study Area; I believe it should be far more protected than it apparently is, prohibiting (ORV) use entirely.

It goes without saying, (almost) that mining, the most Environmentally awful of any of man's endeavors should be outlawed for the whole area. I don't want Southeastern Oregon to become anything like parts of Nevada or Idaho I have had the dubious pleasure of having been in!

One thing we know about mining in this time in History; It is totally unnecessary! We already have mined all the minerals we will need to supply the whole nation with whatever it needs for many years to come; it's in junk-yards all over the country in the ownership of a few thousand dealers. This time around it will have to be bought at fair prices, rather than stolen from the American people at prices based in antiquity!

We are depending upon you, Mr. Sykes to Protect and Preserve the lands under the BLM authority, with YOUR Grandchildren in mind. Will it be a ripped up wasteland when your generation of managers is finished, or will it be pretty much the same then as it is now? Immediate action must be taken in all of the areas mentioned above for the later option to be available!

Thanks for your attention

Loren E. Anslow

P.S. I apologize for such "rusty" typing; you wouldn't believe how good I was 30 years ago.

Wayne Sykes
BLM

HC 10 Box 337
Lakeview Or 97630

11/17/02

Dear Mr. Sykes:

I am writing today to express my concern that the Lakeview Resource Management Plan will not adequately protect these 3.2 million acres. We need to eliminate ORV usage completely. High desert is so sensitive to assault by grazing and ORV. The Alternative D completely ignores this sensitivity. I propose that a strengthened Alternative C be adopted that would protect especially WSA's & ACE's. The concept of adaptive management is no substitute for outright bans on ORV or guidelines to protect wild & scenic rivers or critical wildlife habitat. High desert can sustain less grazing than forests and grazing permits should be retired.

Please do what you can to adopt Alternative C with more safeguards.

Thank you.

Sincerely, *Edmund Keyser*
9421 SW 12th Dr
Port. Or 97219-4205

January 20, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

We are writing regarding the Draft Lakeview Resource Management Plan.

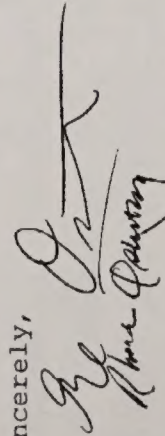
We do not support the preferred alternative and urge you to revise it to base the plan on ecosystem management. The preferred plan is a status quo, commodity based plan that is out of touch with most Americans. We do not believe that your so-called "adaptive management" would lead to changes on the ground.

Grazing and ORV vehicle usage should be far more restricted than under the preferred alternative. As outdoor writers/photographers whose income depends on natural landscapes, both grazing and ORV usage has had negative impacts on our many visits to your district lands. We have personally witnessed much environmental degradation on your district and are shocked that you are proposing continuing this same management style, with one or two minor changes. Grazing should not be allowed on virtually all the area. It should be excluded from allotments not in good condition.

Specifically, all rivers and streams found eligible for Wild and Scenic River designation should be so designate. There are so few major streams on your district that full protection for these areas is one easy step to protect fish.

We urge you to support Alternative C, with modifications to make it more environmentally friendly.

Sincerely,



George and Rhonda Ostertag
6647 Hidden Creek Loop NE
Keizer, OR 97303

January 18, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

I am writing with regard to the Lakeview Resource Management Plan currently being prepared by the BLM. Please consider this letter as an official comment on that plan.

The vast holding of public lands covered in this plan include some of Oregon's wildest and most remote areas. Included in these lands are large tracts of roadless land, which as a finite and diminishing phenomena should be completely protected wherever they occur. Additionally, there are streams which should be granted Wild and Scenic River status, roadless areas which need to be added to our Wilderness lands and a great deal of critical fish and wildlife habitat.

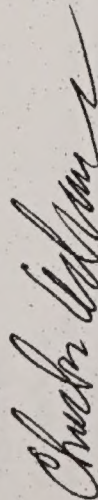
These lands are naturally Spartan in appearance and are easily damaged through such activities as grazing, ORV usage and through any type of resource extraction activity. Having been fortunate enough to have spent time camping and hiking in a number of areas covered by the Lakeview District BLM, I can state that the highest and best use for the vast bulk of these lands is to leave them alone, period.

While my personal belief is that the BLM should adopt Alternative E, which basically precludes human activities, I am grudgingly willing to accept Alternative C, with a few changes. Specific and reasonably low caps must be set on grazing, and ORV use must be restricted to small and clearly designated areas where the least damage to the environment will be done. As a maximum, ORV use should be limited to no more than 30,000 acres, and preferably much less.

Please bear in mind, as you move towards the final decision of record, that you are acting as a trustee for all of the American people when you care for our lands. With that fact in mind, also remember that the American people consistently have asked the agencies charged with protecting our public lands to protect those lands and manage them in a manner consistent with preservation of the natural characteristics and ecological functions of those lands.

In summary, treat our lands lightly, let nature be the guiding force and restore these lands to their former health and beauty, rather than further degrade them.

Sincerely,



Chuck Adams

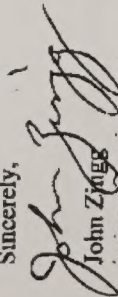
John Zingg
12319 101st N.E.
Kirkland, WA 98034
Fax: 425-820-9980
January 23, 2002

Mr. Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630
Fax: 541-947-6399

Dear Mr. Sykes,

This is letter is in reference to the Lakeview Resource Management Plan. I would urge the BLM to make no changes in current grazing levels or ORV usage. I realize that there are many groups that are wanting the BLM to virtually close off this land to not only grazing but to make it into a wilderness area. I am sure that you are aware that this area is a target area for the Wildlands Project and this is their ultimate goal. Please allow this area to be utilized in a multiple use function, just has it has for years.

Sincerely,


John Zingg
j-zingg@verizon.net

23 January 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630
Fax: (541) 947-6399

Dear Bureau of Land Management, Mr. Sykes, and Staff:

We urge you to keep Oregon's High Desert open for multiple uses by its rightful owners, the TAXPAYING citizenry. These uses would include both recreational (hunting, fishing, camping, horseback riding, off road vehicles, etc.) and commercial pursuits (guide services, mining, grazing, etc).

We have yet to see accurate "science" proving that HUMANS are "plundering and wreaking havoc" on the flora and fauna of our public lands and waters. These lands and waters are the property of the public, and should NOT be locked up nor kept from our use and enjoyment.

Please, exert your influence and powers to PROTECT OUR ENVIRONMENT FROM THE ENVIRONMENTALISTS. The GREENS would have us all move into apartments in town under greater government supervision, regulations, and restrictions, all right in line with UN Agenda 21 (PLEASE, check out United Nations Agenda 21 for yourself, if you have not already).

YOU can play a part in keeping America FREE by not bowing to the extreme and socialistic plans of high financed "environmental" organizations. We don't want our BLM, USFS, or any other public lands under the elitist control of the Sierra Club, the Audubon Society, The Nature Conservancy, the Oregon Natural Resources Council, or any other such groups.

Thank you.

Dave and Jeanne Hallmark
2590 NW 101
Redmond, OR 97756

cc: President Bush, Gordon Smith, Greg Walden, Ben Westlund, Bev Clarno

BLM

RECEIVED

JAN 23 2002

LAKEVIEW, B.L.M.

1-22-02

TO: DUANE SIKES,

Hi, JUST WANTED TO SAY THAT IF THERE IS ANYTHING IN THE 20YR PLAN, THE BLM IS DOING, ABOUT CLOSING OR RESTRICTING THE CHRISTMAS VALLEY SAND DUNES, I AM STRONGLY OPPOSED TO THAT. PLEASE RECORD MY COMMENT ON THIS.

MY FAMILY OF 6 USE THE DUNES TO RIDE AT LEAST 3 TIMES A YEAR. WE ALWAYS STAY ON THE SAND DUNES AND PICK UP OUR TRASH (AND OTHER PEOPLES) EVERY TIME WE VISIT. IT'S THE LAST DUNES WHERE WE CAN BE LEFT ALONE AND JUST HAVE FUN. WE STOPPED GOING TO THE COAST DUNE BECAUSE WE WERE TIRED OF BEING HARASSED.

THANK-YOU FOR YOUR TIME. PLEASE DON'T DO ANYTHING TO RESTRICT THOSE DUNES.

Sincerely,

Brian Woodard Sally Woodard
Brian Woodard Sally Woodard
541-882-9709

January 22, 2002

Dear Mr. Sykes,

It has come to my attention that the BLM is in the process of making some plans regarding the Christmas Valley sand dunes. I understand that public comment is being accepted until the end of January. I ask that this letter be filed in favor of keeping the dunes open to Class I, II and III OHV use.

My family is mainly motorcycle riders and generally we prefer trails to open dunes. However, we have made trips to both the dunes at Coos Bay and your dunes in Christmas Valley. The general consensus is that while your dunes are more "dirty," than those at the coast, they are also more enjoyable because there are generally fewer people and less harassment from law enforcement individuals.

I, myself, have worked for both the Forest Service and BLM on OHV trails here in Central Oregon and I understand some of the problems associated with OHV management. But, I also understand the plight of the OHV user. More and more people are enjoying motorized recreation and yet most public lands are being closed to motorized use.

Sand dunes provide a unique opportunity allowing riders vast areas of unvegetated ground that can withstand higher

impact riders. We are continually trying to restrict our riders in Central Oregon to the trails and play areas, because the High Desert vegetation cannot withstand riding off designated routes. I realize that even around dunes there are vegetation and other resource concerns. Yet, sand dunes are ever changing with the winds and ohv tracks are soon obliterated.

I feel it is extremely important to provide a variety of recreation opportunities on public lands. The Christmas Valley dunes provide an excellent alternative to the dunes at the coast. Because of their remote location, I would imagine the Christmas Valley dunes do not have the same sound issues that the coast does. I also think that the ATV Allocation Committee would be willing to provide some funding to your program because it is such a great opportunity for all three classes of ohv use.

I ask that you keep your dunes open to ohv use. Your time and serious consideration is greatly appreciated!

Sincerely,

Sarah M Schartz

20 Jan

A note from...

Dr. Mark Hanschka

PO Box 4536

Sumner, OR 97707

Dear Mr. Sykes,

I'm writing to comment on

your Lakeview Resource Management

Plan, especially since I have visited
some of these areas and seen the
destruction of riparian areas by
cattle and other ^{previously} unspoiled areas
by ORVs.

I'm urging you to

reject Alternative D, because

to fail to call for any
reduction of livestock grazing,
reflects insufficient river miles
for Wild and Scenic Status, and
leaves most of the area open to ORVs
(protecting only 0.5% of the region).

Instead I am asking
you to approve Alternative C,
(over)

because it would exclude livestock
from riparian areas, exclude ORV's
from some Wilderness Study Areas
(Sand Dunes and Lost Forest)
recommend Wild & Scenic status
for 23 miles of three streams,
close 500 miles of roads in
WSA's and riparian areas, and
prevent mining in many parts
of the region. But Attention C
needs to be strengthened by
further restrictions on livestock
grazing and ORV usage,
both of which are ruining
many areas that were &
haven for hikers and wildlife,
who do not trample or
tear up the land.

Thank you

RECEIVED

JAN 23 2002

LAKEVIEW, B.L.M.

Mark R Hamelky, MD
SARIVER

Order of the Antelope Foundation

P.O. Box 1071

LAKEVIEW, OREGON 97630

January 21, 2002

The Order of the Antelope Foundation, Board of Directors has been asked to write to the Bureau of Land Management and the US Department of the Interior. The 2000 members and many more Lake County taxpayers in Oregon, California and Nevada have requested the Board of Directors ask the Secretary/Treasurer and Chairman of the Foundation, Robert C. Utley, and the Board of Directors wish to make the following comments regarding the BLM Environmental Resource Management Plan.

The Foundation and Order are an environmental group regarding antelope, deer and wildlife management. We also sponsor and are members of the Lake County Chamber of Commerce and Lake County Tax Payers. We are also members of the Society of Range Managers.

Instead of a complete 'slap in the face' like some of the other environmental groups, we believe the Local BLM needs a 'pat on the back' and a 'thank you'. They have done a remarkable job of managing Lake County's public land and we are very proud of them and the Department of Interior. Over the 50 years or more the BLM have completed many great jobs of management for the land and public. "Why change now?" The Board of Directors of the Foundation recommend and request you stay with and adopt *ALTERNATIVE 'A'*, and manage as you have in the past for the US Government and the Public. One of the greatest advantages the BLM has for Lake County and tax payers is that we all realize there is some environmental problems but now, and in the past, if there is a concern the Public and County Tax Payers could always go to the local BLM office and set down in a friendly manner and solve any dispute and settle the problem in a few hours without any law suits or extreme maneuvers. We need to keep the public rights protected.

"If it is not broke, why try and fix or change it?" We need the public and county taxpayer protected to travel the roads and "outback" with roads and trails for enjoyment and camping for our children and grandchildren. **Please stay with ALTERNATIVE A!**

RECEIVED

JAN 22 2002

LAKEVIEW, B.L.M.

SPONSORED BY THE LAKE COUNTY CHAMBER OF COMMERCE

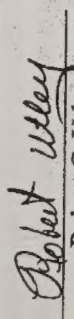
Order of the Antelope Foundation

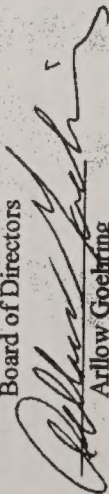
P.O. Box 1071
LAKEVIEW, OREGON 97630

If Alternative B, C (especially), D or E is accepted, please make public and answer a few questions:

- 70-1 | 1. Will the BLM land still be public or Private Government Environment Land?
- 70-2 | 2. Who will be liable to police for violations of use? What are the violations?
- 70-3 | 3. And what can the public do, or not do?
- 70-4 | 4. What are the fines for trespass, miss use, or hunting or fishing? Dollar fines, prison or other?
- 70-5 | 5. Is there ever a chance for alternative studies to open up the Homestead Act, or Desert Land Entries - especially to veterans? This could pay off the National Debt and help run the country.
- 70-6 | 6. What happens if the military needs this land for military maneuvers, especially in the sand dunes area?
- 70-7 | 7. What happens to the private taxpayers land? Can they use it or get to their holdings? These are all taxpayer's concerns. This is why we need Alternative A and let the BLM manage as they have.

Thank you.


Robert C. Utley
Board of Directors


Arlow Goehring
Board of Directors

Lake County Taxpayers
Order of the Antelope Foundation

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70-1: The BLM-administered lands in the LRA will continue to be public lands as they have been in the past. Also see response to comment 22-6.

70-2: The BLM resource specialists will continue to monitor for administrative violations, such as livestock being where they should not be, individuals occupying public land without authorization, individuals extracting sand and gravel without a permit, etc. Law enforcement rangers will also continue to patrol the resource area for unauthorized uses, including vehicles being off road in areas where they are restricted to roads. Violators may be subject to a citation and a fine, or to an administrative trespass fee. A trespass may be any action conducted on public land without authorization when that action normally requires some type of permit or authorization. This may include unauthorized removing of sand and gravel, building a fence, pipeline, or road, or occupying public land, etc. BLM has no authority to enforce hunting and fishing laws and regulations.

70-3: Please see response to comment 70-2.

70-4: Refer to response 5-1.

70-5: Military activities are considered valid uses of the public lands and are authorized under existing laws and regulations. All future proposed military activities will be reviewed on a case-by-case basis for land use plan consistency, compliance with NEPA, and other appropriate laws and regulations. Refer to Appendix B for more discussion.

70-6: By law, the BLM is obligated to provide private landowners with reasonable access to their private land; therefore, access to private holdings should not pose a problem, regardless of which alternative is implemented.

70-7: Please see response to comment 31-1.

Rob & Kristi Elder
43530 Hwy. 31
Paisley, OR 97636
Home Phone 541-943-3350

January 21, 2002

Dwayne Sykes
RMP Team Leader
US Dept. of Interior
BLM
HC 10 Box 337
Lakeview, OR 97630

RE: DRAFT LAKEVIEW RESOURCE MANAGEMENT PLAN

VOLUME I

71-1: Please see response to comment 31-1.

2-31 "for example, wet meadows are converting to dry meadows as a result of lowering water tables caused by irrigation pumping and surface water diversion." I believe this to be a flawed statement, surface water diversion actually helps build water tables. I'm sure there have been studies done that would back this up. It is widely accepted that beaver dams help build water tables and surface water diversion mirrors much of what a beaver does and more. If the quote as cited is true, then where in Lake County are the examples of wet meadows being converted to dry meadows, and can it be proven that it is from irrigation pumping and surface water diversion?

71-2: Please see response to comment 22-7.

2-68, 2-69 "No commercial feedlots operate in Lake County or in Harney County." If you were to contact the Lake County Extension Agent, Marni Porath, I believe she would be able to point you to several commercial feedlots in Lake and Harney Counties. I, myself am familiar with two in Lake County, one being in Silver Lake and the other in Adel, and am quite sure that there are more. I believe that using only CenturyTel as a source is a poor way to back up this statement, because many businesses do not use a telephone book as a form of advertisement. You use CenturyTel as your sole source of references to your research and cite

many times through out the document, limiting your access to the other information that is available, which may render your EIS flawed.

VOLUME II

Appendix E.

71-3

A-72 In reference to the West Clover Flat allotment, it is put that there are 2776 other acres within this allotment. According to my figures, there are only approximately 500 acres of private land within this allotment. I would like to know if your figures are different and why. One of the concerns are that grazing might be affecting surface water quality. There is no surface water within this allotment. If it is believed that I am wrong, I would like to know where. The statement is also made that juniper encroachment is impacting ecological conditions and quaking aspen/bitterbrush stands. There are no quaking aspen on BLM ground within the West Clover Flat allotment. Is there an explanation for why these statements are made?

71-4

This area is nominated for an ACEC (Red Knoll). This area is far from the criteria used to establish an ACEC. There are no endangered plants or animals in this area. This area is a crested wheat seeding with a small amount of medusahead. There is no reason to declare this area an ACEC. While we're on the topic of ACEC's, I would like to voice a strong opposition to any ACEC within Lake County. There are no reasons for ACEC's as endangered plants, animals, and cultural resources are already protected by federal law.

A-237 I don't agree that Red Knoll meets the relevant criteria to be declared an ACEC. There is very limited access to this area because it is largely surrounded by Private Lands. What effect would this ACEC have on those private lands? If this area were considered an ACEC, it would make it very difficult to control the medusahead which is wide spread within the Red Knoll ACEC. There aren't any fish and wildlife resources within this area that would require an ACEC. Once again we believe that this area already has all the protection it needs in the federal law, and by declaring it an ACEC all that will do is put extra hurdles in the way that are not needed. If the BLM were still to believe that this area was worthy of an ACEC designation, I

71-3: The boundary of the West Clover Flat Allotment includes 2,776 acres of private land. Refer to Map G-3 and Appendix E1. Refer also to comment response 22-18. The allotment is part of the Green Creek Watershed, which is at the very top of the Willow Creek Watershed. Willow Creek is a 303(d) listed stream for temperature. Visual inspection does not reveal evidence that grazing is affecting the downstream water quality of Willow Creek. If there is a change in management or water quality, an effects analysis will be conducted and grazing will be assessed for possible effects on downstream water quality.

71-4: Refer to comment response 22-10. The ACEC designation does not apply to private lands in the area. No roads that access private property were recommended for closure if they provide the only access to that property. ACEC designation does not preclude treatment for medusahead. Generally, designation does not automatically prevent normal actions which the BLM might consider.

would suggest that the boundaries be moved to not include any crested wheat seedlings, developed springs, or fenced areas.

A-83 (Paisley Flat) Why is impact to biotic crust a concern in only this area, as compared to other areas? If you are researching biotic crust, include all research, including that done by Allan Savory.

71-5

What type of noxious weed(s) is encroaching the Paisley Flat?

8-295 (Map M4) An area within Clover Flat has been identified as having an occurrence of base and precious metals. First of all, I want to know what your definition of base and precious metals are? What base and/or precious metals were found? Second, where specifically are these locations at? How were they located? When were they located? And, by whom were they located?

71-6

Thank You,

Rob and Kristi Elder

Rob Elder
Kristi Elder

71-5: Paisley Flat is one area where microbiotic crusts have been collected and documented. However, microbiotic crusts are a concern for the entire resource area. See response to comment 228-3 and reworded text. In the North Lake ecological site inventory soil/plant community survey, the teams have scored the range form for classes and percent of cover for lichen, mosses, and algae. Research is being encouraged for microbiotic crusts in all of this section of the Northern Great Basin to determine if principles established elsewhere are applicable here. With this new information, it should be possible to establish microbiotic crust guidelines for management decisions.

71-6: A base metal is a metal inferior in value to platinum, gold, and silver; the term is generally applied to commercial metals, such as copper, lead, zinc, etc. A precious metal is a metal superior in value to commercial metals such as copper, lead, zinc, etc.; it is generally applied to precious metals, such as gold, platinum, and silver. Also see response to comment 22-6.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

P.O. Box 460
Cedarville, CA 96104
530-279-6101
530-279-2171 FAX

January 24, 2002

6840(CA-370)P

MEMORANDUM

To: Dwayne Sykes
From: Jim Eichler, Surprise Field Manager
Subject: Draft Lakeview Resource Management Plan/EIS

The purpose of this memo is to comment on the nomination of Twelvemile Creek as Wild and Scenic River (WSR) and the Rahilly- Gravelly area as an Area of Critical Environmental Concern (ACEC) and as Research Natural Area (RNA). We concur with the listed values of Rahilly-Gravelly and agree with the nomination for ACEC/RNA designation.

We agree also with the nomination of Twelvemile Creek for WSR Eligibility and Suitability and have the same opinion that the biological criteria for outstandingly remarkable values are met for threatened fish populations and habitat. However, we believe you should also consider archaeological values as criteria for eligibility designation as well as the biological values. We also believe that it is not wise to lower the classification from scenic to recreational for the purposes of allowing greater flexibility in the management of the fish populations and habitat. It is not appropriate, and it does not protect and enhance the outstanding and remarkable values by doing this. Lowering the classification from Scenic to Recreation could actually have a detrimental effect on the archeological and fish populations values.

Twelvemile Creek and Rahilly /Gravelly are adjacent to our resource area and the Surprise FO would need to adopt your management practices for this area. We are currently managing these areas for the values listed in your nominations for WSR and ACEC/RNA designation. We do not anticipate any major changes in our current management if these areas are designated as a WSR and an ACEC/RNA.

On your description of Twelvemile Creek Drainage on page A-266 you describe the canyon slopes as being dotted with pinyon, juniper, etc. You should remove the pinyon reference from the description.

72-1

72-1: The archaeological resource values associated with the Twelvemile Creek corridor were evaluated and reported in the "Wild and Scenic River Evaluation Report for the Lakeview Resource Area" (USDI-BLM 1999c). Through this evaluation process it was determined that there were no known historic sites, structures, or events which met the criteria as river-related outstandingly remarkable values (values unique, rare, or significant on a regional or national level). Nor were there any known traditional uses that would qualify as outstandingly remarkable values. The recreational classification under the national wild and scenic river system would provide adequate protection of the outstandingly remarkable values related to fish on a long-term basis. Please refer Appendix J3 of the Draft RMP/EIS for more information.

72-2

72-2: The reference to pinyon has been removed from the text in the Twelvemile Creek Wild and Scenic River suitability determination.

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

23 January, 2002

Dear Dwayne:

While gross overview of alternatives in any plan never fully produces an adequate choice, Alternative C in the proposed RMP is the only alternative that seeks to resolve the problems facing the public land after more than 100 years of abuse and bad management.

The devil, of course, is in the details.

There are two critical statements I perceive as flaws in the document and procedure.

ACEC

1. Pronghorn ACEC. After seeing the destruction of the Beatty Butte allotment over the years, I am not convinced any longer that it does not deserve status as an ACEC on the scope of the Pronghorn proposal. There should be further review of the proposal in this RMP.
2. Alkali Lake. While there is still some question as to the scope of the threat posed by the chemical dump, it certainly does constitute a hazard. Specifically the 245T manufacturing residues released on site are far more dangerous than the pesticide itself. The statement that it is not a natural hazard and not therefore eligible for ACEC status is fraudulent. ACEC does NOT pertain only to natural hazards, and in fact chemical dumps and nuclear waste sites are ACEC's. The fact that nobody knows exactly what is on site to this day furthers the hazard potential.

MANAGEMENT ALTERNATIVE TABLES

The following are comments on the alternatives, with suggestions for recommended actions and other commentary.

PLANT COMMUNITIES

Goal 1

73-1: The BLM has already evaluated this proposal and determined that much of the area does not meet the relevance/importance criteria or require special management. This is documented in USDI-BLM (1999b). The BLM is not aware of any new information, nor have you presented any new information that would require reevaluating this proposal at this time.

73-2: 43 CFR 1601.0-5 and 1610.7-2(a)(1) and (a)(2) describe potential ACEC's as being *natural* hazards, not man-made hazards. In determining potential ACEC's to be addressed in the plan, the BLM followed the definitions given in the regulations.

The Chemical Waste Disposal Area at Alkali Lake is owned, operated, and monitored by ODEQ. ODEQ has determined that the chemicals found at the site do not appear to pose significant risk to human health. The BLM, as an adjacent landowner, is an affected party by any contaminated plume leaving the disposal area. The BLM will continue to work with ODEQ on any remedial actions/response actions that are developed for the site. This is described further in the "Hazardous Materials" section at the end of Chapter 2.

73-3

No alternative should allow grazing after only two growing seasons of rest after fire.

While alternative C calls for 2 full years. I would suggest all alternatives call for at least 3-4 years of rest. As range texts point out, in bunchgrass communities, it is the loss of root systems that is the real damage, not forage loss to the permittee.

I have never seen a fire recovery on the Lakeview District in 23 years that was not set back, or ended by over-grazing too soon after fire. The Cook Well fire was a classic tragedy resulting from grazing after fire. Where native grasses surged after the fire into some of the most fantastic grassland on public lands, the area was destroyed by grazing and now consists of weeds, rabbit brush and cheatgrass. Had the area been protected, it would have served as source to rehabilitate thousands of acres north of the Squaw Ridge Lava area and east to Coyote hole and the sinks area.

NOXIOUS WEEDS

The primary source of weeds in the west is livestock grazing or agriculture, with the out-of-orbit arboriculturist running close behind.

All alternatives should call for the immediate removal of grazing from any allotment, or in proper and limited cases, pastures, that have weed infections.

73-4

Crested wheatgrass, due to its allelopathic nature, should also be considered an introduced weed where native grasses comprise more than 10% of the flora prior to fire or other action requiring rehabilitation.

Recognizing the current problems in acquiring cost efficient sources of native seed, until a solution is found, seeding for rehabilitation must be considered a weed risk far exceeding benefit to geomorphology, or forage provision to a subsidized industry.

Seeding of non-native species should be prohibited in all alternatives except to replace failed seedings like Hawk Valley where the native systems (and seedings) have already been destroyed.

Water Resources/Watershed Health

73-3: Please see response to comment 49-1.

73-4: Please see responses to comments 17-4 and 98-4.

Standards for Rangeland Health (8/12/97), and the ROD for Beatty Butte Allotment 7/98 have not been implemented to protect water resources. The Oregon drought policy for grazing should have been included in the RMP; but it is totally inadequate to protect the land and waters.

The only sound action for the RMP in all alternatives is to totally remove livestock from all wetland, riparian, or surface water sites on the District. Wildlife species have no problem in entering enclosures and providing grazing to prevent "wolfy" (I hate that stupid term) plants.

There is access to 8100 moneys and other sources to protect these critical desert ecosystems, and all efforts of the Bureau should be dedicated to this as a first priority on every acre of public land.

ANY PERMITTEE DAMAGING WATER RESOURCES SHOULD BE BANNED FROM GRAZING ON PUBLIC LAND FOR A MINIMUM OF 100 YEARS BEYOND THE LIFE OF HIS CURRENT HEIRS OR ASSIGNS!

In wet years, water can be piped out to cows. In drought years with 30% or less of average rainfall, removal of any native waters should be prohibited for livestock uses. Water should be trucked from private land sources or municipal supplies, with strict control of trough placements, to address wildlife planks, sensitive lands, or special management areas (WSA's ACEC's etc.).

There is no watershed in Oregon that is in truly satisfactory condition. While Lakeview has not Lahonton cutthroat trout, who knows what we could have if streams that were perennial in 1875 could be re-established?

While road closures should be considered, providing access to lands might best be accomplished by relocating certain roads rather than totally closing access (alternative C). At the same time, any road that management does not depend on for critical management should be closed if in anyway affecting watersheds.

FISH AND AQUATIC HABITAT

Alternative C is the best management objective. It should be realized by this time that in (4) impacts can be positive, as well as negative and management actions that have a positive impact should be authorized and encouraged.

Livestock should be excluded from any steam system with fish; to include the prohibition of water gaps.

73-5: The Beatty Butte rangeland health standard assessment (USDI-BLM and USDI-USFWS 1998b) addressed water resources in Standards 2 and 4. In Standard 2—Riparian/Wetland, it was determined that the standard was not being met on portions of Guano Creek and that grazing was a significant factor in not meeting this standard. Guano Creek was excluded from grazing as part of the jurisdictional transfer with Hart Mountain National Antelope Refuge. This plan has been implemented and a fence was constructed, which excludes cattle from Guano Creek. It was determined that livestock grazing was not a factor in other water resource problems.

Big Rock Reservoir pipeline should be removed. This reservoir was not constructed for livestock, and there was clear malfeasance in the paperwork to authorize this project. The BLM authorizing officer left BLM immediately after signing the document and went to the state agency the authorization placed in charge of the pipeline. This prime fishery has repeatedly been drained. The claim that "fishermen" drained their reservoir hardly holds water. (pun intended) The state can drill a well to provide water on state grazing lands and let the permittee pay for it.

WILDLIFE AND WILDLIFE HABITAT

Management Goal 4 Alternative C

Livestock grazing in crucial deer or antelope winter range should be curtailed if the removal of current year's growth of browse exceeds 5%, not 30 percent. The main reason browsers decline in Lake county is not the predator increase, but the destruction of browse by over-grazing of livestock. While this problem is only extreme on BLM lands, it is abysmal on U.S. Forest Service lands. BLM cannot control the other agency's management, but at least BLM can offer refuge to animals displaced by cows on the Forest.

LIVESTOCK GRAZING MANAGEMENT

While alternative C is an improvement, it does not convey the need to reduce livestock numbers on BLM land. (NOTE: I do not advocate removal of an authorized use. But the Taylor Grazing Act, and all LAW defines livestock grazing as a PRIVILEGE, not in any way a RIGHT!) PRIA also considers grazing a privilege subject to controls and not a right open to abuse.

FLPMA (1976) also states repeatedly that the health of the land must take precedence over economic uses of the public land. It should be noted that recreation repeatedly is listed as a use of public lands BEFORE livestock grazing and mineral production, Congress was giving us a hint in the "Organic Act".

While some areas on Lakeview Resource Area are improving slightly, the Beaty Butte allotment should be retired for a minimum of ten years. The current permittee should be removed from public lands for at least 100 years past the lifetime of their current heirs or assigns.

I have watched this allotment deteriorate for 25 years, and current conditions should be considered a criminal act. The

73-6

73-6: Timing and duration of livestock grazing in mule deer winter range is a concern, both to the BLM and ODFW. Most browse is heavily utilized in the fall months after grasses begin to dry out. Grazing systems in many allotments are designed to minimize impacts to wintering deer by removing cattle from the allotment before browse is most palatable. There are some allotments where overutilization of browse is occurring. Rest-rotation grazing systems would be tested in these allotments to try to minimize the conflicts between cattle and wildlife. Intensive browse monitoring is proposed in affected allotments to document browse use both by cattle and wildlife (refer to Appendix R). It is unclear at this point exactly how much annual browse use occurs from cattle and from wintering deer.

hauling of water in the 2001 grazing season should never have been allowed in the first place. NO safeguards were enforced. Water troughs did not have planks, WSA acreage was devastated by over-grazed water stations, and drought year grazing seriously damaged the below ground resources of bunchgrasses as the 60% maximum removal reached 100 percent over most of south Beaty Butte.

The Beaty Butte AMP should be scrapped, re-opened to design and public review. This document is abysmal.

All temporary non-renewable grazing permits should be stopped immediately. As long as there is an antelope, bighorn, or head of wildlife, including rabbits, on public land, there is no "additional forage production". I have also seen TNR permitted where grazing maximums had already been exceeded. The only way to stop this abuse is to totally stop TNR.

Suspended Non-Use

All suspended non-use in the former Warner Lakes Resource Area should be abolished. The adjudication was based on a fallacy of the 1960's that assumed water was available with even distribution across the range. This is most acute in the Beaty Butte allotment. ^{factually}

Allocation of forage should also address removing more forage from livestock and giving it to wildlife to aid the progress of restoring elk to the area. (ALL BLM range personnel should read "The Cattle Drives of David Shirk" available in the reference section of the Lake County Library.)

Water developments: NO ADDITIONAL DESTRUCTION OF NATURAL WATER FOR LIVESTOCK GRAZING, EVER, ANYWHERE!

While federal funds did provide for the construction of South Corral Spring and the enclosure (making it subject to federal regulations) the devastation that occurred on this private parcel has been identified as a precursor to additional destruction on public lands to this respondent. This "improvement" that destroyed the spring was a crime against nature.

Minor work to divert stream water outside enclosures, or PROPERLY designed projects for wildlife is one thing, but NO spring destruction with primary use to be livestock grazing.

Frankly, due to the critical nature of water to human use as well as wildlife on public lands, any water development for livestock

73-7: The long-term trend data for the Beaty Butte Allotment shows a steady improvement in ecological conditions across the allotment over the last 20 years. Water hauling was allowed in 2001 because of the lack of water sources following the dry winter of 2000-2001. There was adequate forage on the allotment, but additional water sources were needed to more evenly distribute the livestock. The utilization in the livestock-accessible portions of the south pasture was 50 percent for the key species. Some areas had little or no grazing, due to topography or distance from water. There were areas of heavy use around some water sources, mostly in the eastern part of the south pasture. The temporary water troughs were placed along existing roads or in existing dirt tanks. There was one trough accidentally placed on the wrong side of the road within a WSA. This trough was moved as soon as it was discovered, and the site (about 2 acres) will be reseeded with native plants.

73-8: There are 22 allotment permits with AUM's in suspended nonuse, which include 23,807 AUM's. The AUM's in suspended nonuse are not authorized to be used by any permittee, and any change would require the preparation of at least an environmental assessment and a grazing decision—this includes public notification and the opportunity to protest and appeal. To activate suspended nonuse, it would have to be demonstrated that additional forage was available on a sustained yield basis and that it was consistent with multiple use management objectives.

should be addressed in an EIS to address cumulative impacts. The days of EA's for such projects are gone, relative to the impact on diminishing resources.

SPECIAL MANAGEMENT AREAS

ALL 16 special management areas in Table 3-3 (RNA's ACEC's, etc) identified in this document should be designated, with consideration for more as time goes on and development occurs, especially in the north end of the Resource Area.

Wilderness Study Areas: All lands acquired adjacent to, or included within existing WSA's should be reviewed under Section 202 for possible addition to the WSA. The acreage identified in Alternative C should be the beginning. The Lynch acquisitions certainly qualify. A concerted effort should be made to acquire the private land at Poison Creek to provide public access to the trail entering the Abert Rim WSA. This is the only trail to the top of the rim.

HUMAN USES AND VALUES

FLPMA (1976) specifically notes that use of the public land should NOT be focused on those uses effecting the greatest economic return.

Despite the emphasis on local economies currently in favor, the public lands belong to all the people of the United States.

Management decisions must reflect actions that are for the good of the land for all Americans and future generations. The Management Goal, number 2 is poorly worded and counter to the intent of FLPMA, therefore not appropriate for citation in Alternative C especially, by reference to B.

Protect all 16 ACEC's and leave the door open for more protection for sensitive resources to be protected for future generations.

FIRE MANAGEMENT

Goal 1. Fire suppression should be more definitive on what constitutes property. Suppression should look to Goal 3, and suppression occur on much of the resource area only when clear and present danger is present. WITH one proviso, Goal three should be accomplished as soon as feasible to allow natural fire to return to its natural role in this fire adapted/dependent area of the nation.

73-9

73-9: All lands acquired adjacent to or included within existing WSA's have been reviewed under Section 202 of FLPMA, including the Lynch acquisitions. These findings are described in Appendix J4 of the Draft RMP/EIS. One of the units found suitable for wilderness designation is located adjacent to private land at Poison Creek. Public access to the top of Abert Rim could be provided by this parcel. If the adjacent private land were acquired, a wilderness inventory and suitability determination would be conducted as part of the environmental analysis prepared to process the exchange.

73-10

73-10: Management Goal 2 of the "Human Uses and Values" section has been revised to improve clarity. The BLM believes that the goals and specific management actions listed for Alternatives A-D are in keeping with the intent of FLPMA.

73-11

73-11: Property can be defined as something tangible or intangible to which its owner holds a legal title. The "Review and Update of the 1995 Federal Wildland Fire Management Policy" (USDI and USEPA 2001) provides direction for protection of property. The following is stated in item 6 (page 23):

"The protection of human life is the single, overriding priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be based on the values to be protected, human health and safety, and the costs of protection. Once people have been committed to an incident, these human resources become the highest value to be protected."

RECREATION

6. Alternative C. With the new licensing to be forthcoming from the State of Oregon, in compliance with input from the providers, maximum use numbers should be established after the state cites controls and regulations.

While controlling vehicle access is important in winter, I find it difficult to justify putting greater restrictions on these schools than on livestock grazers and cows. As the Freer school has a very adequate winter training program (which they typically operate elsewhere due to access) I would like to see some rationale for this recommendation.

OFF HIGHWAY VEHICLES

While alternative C is closer to the needs of the real world with high levels of "limited" designations, there may be some areas where open designations might still be suitable to identify limited areas for OHV use. Leaving the majority of the area "OPEN" is clearly bad management because of the misconception on the part of the public with respect to what this means.

As noted repeatedly by Tom Harris of the Pacific Northwest Four Wheel Drive Association, even "Open" isn't really a hands off completely open designation.

VISUAL RESOURCES

As noted in the text, prior inventory documents were lost, and in fact the old inventories do not fully comply with new standards. A full review of the visual resource of the Lakeview Resource Area should be conducted. Special emphasis should be to attempt to raise management awareness in areas where water features are not present. This is a particular failing of the BLM system that does not seem to recognize the grandeur of a landscape absent waterfalls and streams.

ENERGY AND MINERAL RESOURCES

Definitely the protection of alternative C!

ROADS AND TRANSPORTATION

73-12: The group size limitations (nine students, plus staff) for wilderness therapy schools as proposed under Alternatives A, C, and D were set after negotiations with representatives of the wilderness therapy schools that were authorized to conduct operations within the LRA. Temporary Oregon Administrative Rules, effective November 29, 2001, as drafted by the Department of Human Services, State of Oregon, set the number of participants (i.e., students) for an expedition group to not exceed 12. It is anticipated that the group size limitation of 12 will carry over into the final Oregon Administrative Rule governing the licensing of outdoor youth programs (wilderness therapy schools). Limiting groups to 12 students, plus staff, was analyzed under Alternative B. However, Alternative D, with a group size limitation of nine students, plus staff, is within our preferred alternative. The State of Oregon, Department of Human Services, did not consider impacts to natural resources in their determination to set the maximum group size at 12 students per expedition. We would not consider authorizing any groups to operate above the group size limitation set by the State of Oregon. However, in consideration of health and safety issues and potential conflicts between other users, and to address potential impacts to resources, group size limitations below the standard set by the State of Oregon would be addressed under the terms, conditions, and special stipulations that are part of the special recreation permits authorizing the wilderness therapy schools to operate on BLM-administered lands.

73-13: Impacts to roads associated with the operation of the wilderness therapy schools have been well-documented. These impacts are primarily associated with operations in the north Lake County area. Wilderness therapy schools in north Lake County have traditionally operated on a year-round basis. To provide logistical support to their field operations, the number of scheduled trips into and out of the field average two to three trips per week per school. During any given week, unscheduled trips increased the total number of weekly trips to four or five.

The Catherine Freer Wilderness Therapy School has not operated in the Christmas Valley/Frederick's Butte area of north Lake County. Freer has historically conducted operations in the fall and spring, and the potential for impacting roads during these wet seasons does exist. However, each of Freer's expeditions consists of one trip into and out of the field. Each expedition is conducted over a 21-day period, and they do not use vehicles within this 21-day period except in the case of an emergency or when other special circumstances occur. Seasonal restrictions relating to access for any of the wilderness therapy schools would be considered on a case-by-case basis and would be addressed in the terms, conditions, and special stipulations associated with the special recreation permits authorizing them to conduct operations on BLM-administered lands. Likewise, any restrictions on access associated with livestock grazers operating on BLM-administered lands would be considered on a case-by-case basis, would be in response to impacts which were occurring because of these activities, and would be addressed through the administration of the permits authorizing these activities.

Definitely Alternative C. This is especially important for protecting lands from "commodity production" identified in Alternative B.

TEXT

Plant Communities

Management Goal 2 Alternative C, the restoration of playas is particularly important given the penchant for digging non-productive waterholes in the 60'-80's. The only case of a hole being filled in a playa took place in Hawksie Walksie, and had dramatic positive results.

Noxious Weeds

Get the cows out of weed areas! All imported cows and the trucks carrying them should be subject to the standards applied to other vehicles, treat 'em or don't greet 'em!!!

Chapter 4: ENVIRONMENTAL CONSEQUENCES

- 73-15 | 1. Impacts can be positive as well as negative!!
- 73-16 | 2. Figure 4.1 State and Transition model of successional change in sagebrush steppe (from West 1999) should have been included in document.
- 73-17 | 3. Wildlife Management Goal 2, p.4-59 alternative C, would not the restriction on allowed burn area moderate the amount of sagebrush habitat during life cycles of affected species lost at any given time?
- 73-18 | 4. Livestock grazing p.4-79. Losing the Devils Garden "emergency" allotment is NOT a loss. This area was grazed for decades on a regular basis, and habitat declined. As this is within not only a WSA, but an ACEC, foreclosing livestock use to benefit Elk and other wildlife is completely consistent with the ACEC designation. The original plan for emergency use was one grazing cycle in twenty years, haven't seen that yet.

As noted in earlier comments, the removal of suspended non-use does not constitute a loss to grazing, as in actual practice the forage was never available in the first place.

73-14: Alternatives C and D have been rewritten to address mitigating intrusions

73-15: Comment noted.

73-16: Figure 4-1 was inadvertently omitted in the Draft RMP/EIS. It has been included in the Proposed RMP/Final EIS.

73-17: Restrictions on burning would regulate the amount of habitat available to sagebrush-dependant species at any given time. The point of this discussion under Alternative C is that all fire on the landscape needs to be done in a way that does not significantly reduce habitat for sagebrush-dependant species. Controlling wildfire is partly responsible for present conditions and in itself would not fix the problem. It is going to take *active* habitat restoration to fully accomplish Wildlife and Wildlife Habitat, Management Goal 2.

73-18: The loss indicated on page 4-79 of the Draft RMP/EIS refers to the loss of forage available for emergency use in the Devils Garden area.

Increased forage resulting from prescribed or natural fire should NOT be allocated to livestock, but instead to leave wildlife forage and restructuring material for soil stabilization and return to soil-building after a century of soil loss. Pedestal growth of plants across the area demonstrates the loss of soils and over-grazing in the bunchgrass community.

This again raises the point that 2 growing seasons of rest is NOT sufficient for plant recovery in the area. Land burned and put back into grazing after only two growing seasons will continue to be abused and not realize full potential. If any alternative allows entry of cattle before full restoration of growth medium, the impact of grazing will be adverse.

**** Questions to answer**

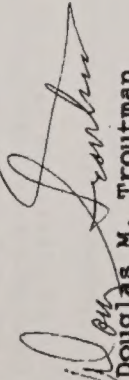
1. If the traditional cow-calf operations were converted to an actual beef producing need to have fat, not merely living, cows come off the range, would the impact be a change in environmental conditions? Would grazing densities decrease?

Enough for now, Dwayne.

I supply this information for the present, and will probably submit additional questions, and or commentary in the future.

Thank you for incorporating this information in the record

Sincerely


Douglas M. Troutman
428 South G Street
Lakeview, OR 97630
541-947-2624

73-19

73-19: This is a hypothetical question to which there is no clear answer. Assuming the question refers to the possibility of grazing yearlings instead of cow-calf pairs, there would be more early spring and early summer use, which would be detrimental to the rangeland conditions. Any changes in cattle densities would vary by allotment and the season of use would change with more use being made during the growing season when plants have the best nutrient quality.



To: Dwayne Sykes
BLM Lakeview District Office
HC 10 Box 337
Lakeview OR 97630

Date: January 15, 2002

From: Barbara Vail
20510 Bowery Lane
Bend, Oregon 97701
Tel. (503) 389 1304

Ref: Lakeview Resource Management Plan

Of the five alternative proposals under review, it appears that Alternative C offers the best protection for the area. However, I should like to see greater restrictions on livestock grazing, particularly near rivers and ecologically sensitive areas.

As for Offroad Vehicle use, which I personally deplore because of its destructive nature and waste of fossil fuels, I realize that the sport (?) is enjoyment for some people. May I suggest that a restricted area be set aside for ORV use, say ten acres or so, allowing them to tear it all to pieces as they wish, with the proviso that any such vehicles caught outside the boundary lead to the driver's arrest, subject to enormous fines and imprisonment.

I am pleased to learn of the serious study undertaken for protection of this very special area and thank you for your leadership in the process.

Dwayne Sykes
BLM-Lakeview Office
HC Box 337
Lakeview, Or 97630

Dear Mr. Sykes;

Am writing today to share my observations with you in regard to your Lakeview Management Plan.

75-1

I finally got a permit to deer hunt in Eastern Oregon, Lakeview Area, after years of applications. My Partner and I spent 5 weekends driving the area before we chose the Lofton Reservoir south of Quartz Mtn for our hunt. We then hunted the surrounding 10 mile radius for a whole week, unsuccessfully I might add. The following is an impression of those 2 plus weeks of, in the woods, observations.

I was amazed at the number of cows in the forests. Everywhere we traveled there were cows. Any place we found water there were a couple dozen animals. Every water source was trampled into a mudhole quagmire. It was almost impossible to find any fresh water, drinkable for any beast. Of course, every edible plant was eaten to the roots and even the aspen where seriously destroyed. Large portions of the forest reminded me of my fathers barnyard back in Wisconsin on a dairy farm. Why are there so many cows and what are they doing in the forests at deer season? Hunting brings the state more money than those few ranchers, and we have more votes, too.

I was also sickened to see the present "thinning" practices in the area. Frequently only one scrawny scrub tree surrounded by acres of slash or generic pine plantation, which have no resemblance to an ecosystem. Then drive for miles and miles of thick overgrown brush filled forest that needs burning or thinning. It was hard to find a mature tree anywhere, talk about rape and plunder! The log dump here in White City is full of 12" trees, are we never going to see another mature pine or fir??

That land belongs to each of us, Americans, and we pay you to protect and manage it. I was raised on a fine dairy farm and taught to be a custodian of the land. The travesty I witnessed was not management, there a lot of words to describe such neglect.

It is time to make decisions reversing these exploitative practices. If we want our children to be able to live on this earth, we had better start taking care of the trees and water. It is time for you to develop objective standards and cease this "chosen few" practice (which smells corrupt to me). I recommend that you seriously consider Alternative C and discontinue the adaptive management strategy of today.

Sincerely,
Bradley E. Taft
3621 Ross Lane
Central Point, Or 97502

75-1: The BLM congratulates you on getting your long-awaited deer permit. Based on the description in your letter, you are commenting on the condition of lands administered by the Fremont National Forest, not the BLM-administered lands covered by this plan.

RECEIVED
JAN 2 2002
LAKEVIEW, B.L.M.

Fort Rock, Or. 97735
January 22, 2002

Dwayne Sykes
BLM 1301 S. G St.
Lakeview, Or. 97630

Dear Mr. Sykes:

This letter is in response to the BLM, Rangeland Resource Management Plan/Environmental

Impact.

I am in support of alternative A, No Change in management. We would like to see public roads open to the public. We don't need any more public land removed from public access. Cattle grazing should continue, as it is a valuable tool to the range and forest.

Alternative A, administrative policy under multiple use, is our choice.
Thank you.

Yours Truly,
Doris Kithledge

January 20, 2002

Dwayne Sykes
BLM, Lakeview District
HC 10, box 337
Lakeview, OR 97630

RECEIVED

JAN 24 2002
LAKEVIEW, B.L.M.

Dear Mr Sykes,

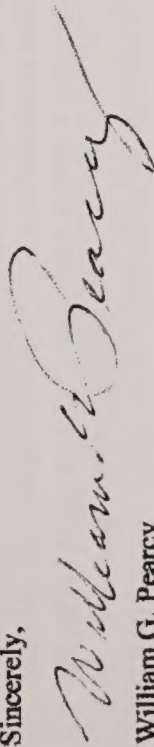
I have lived in Oregon for over 40 years and have spent many a day in the southwest part of the State, including Warner Valley, Hart Mountain, Abert Lake and Guano Creek areas. Much of this high desert habitat is recovering from the abuses of past by livestock grazing, as you know, and enhanced protection is essential for continued recovery. Last summer, during our drought, Guano Creek remained flowing and was a critical refuge for redband trout.

For these and many other reasons, I urge you to adopt Alternative C, rather than D, for the management of the Lakeview Resource Management Area.

The two most important differences between these plans, in my view, is that C calls for reduction in livestock grazing on these unfertile, high desert lands. This is essential for recovery of the habitats. Most important, it provides better protection for critical riparian areas. It excludes livestock from all riparian areas, that thin region next to streams that is essential for good habitat for redband trout and for native wildlife, recommends Wild and Scenic River status to Guano and other streams, and closes roads in Special Management Areas to roads. I also think that there should be no increase in the areas open to ORVs.

Please adopt Alternative C.

Sincerely,



William G. Pearcy
24362 Cardwell Hill
Philomath, OR 97370

W

To: Lakeview BLM Office, 1300 South G Street, Lakeview, OR

From: Robert Lund, 606 South G Street, Lakeview, OR

I enjoyed reading and reviewing your draft RMP/EIS for the Lakeview Resource Area and found it to be very comprehensive and detailed. So comprehensive that I may have overlooked the very points of my interest. Therefore, I ask for your assistance and indulgence if I direct my interest to my many concerns that may be covered but which I may have overlooked.

1. Concerns and Interest Related to Oregon's Outback National Scenic Byway (ONSB).

As the BLM District Manager, ^{AT LAKEVIEW} is the initial signatory for the nomination of Oregon's Outback State Scenic Byway to be designated (successfully) as a National Scenic Byway. I am surprised at the limited recognition in your management planning. BLM has played a significant role in management and plan development with numerous BLM recommendations being included as key points of the final interpretive plan, in partnership with the Lake County Chamber of Commerce. I find it odd that I couldn't find related recommendations in your RMP for:

A. Visual Resource Management

As Highway 31 through public lands is now a National Scenic Byway, it would suggest that a higher degree of visual management would be recognized.

Although, in general, VRM Class III is correct for the majority of the management (or visual) corridor, you may want to consider Class II for the foreground zone along both sides of the Outback Byway where public lands are involved.

Even though the National Scenic Byway program is not a preservation program and the management plan for the Outback allows continued development, a higher degree of care is warranted. In addition, the designation as National Scenic Byway carries with it a public myth that scenic management is paramount. It still seems wise to establish a higher degree of care for the visual resources immediately adjacent to the highway.

I particularly recommend that, under the Special Leasing Stipulations, page A-309, visual resource Class II be used or a separate sub-section be established that applies visual resource Class II terminology to the Outback. My main concerns are that barrow pits and rock quarries should be managed with visual resource management skills being applied to such leases.

B. State "Tour" Routes

In the development of the corridor management plan for the Oregon Outback National Scenic Byway, it is the goal of the plan to take advantage of ODOT's scenic roads program by adding their designation of "tour" route to local roads

78-1

78-1: Please see response to comment 73-14.

leading off the Outback. A number of such potential tour routes cross public land or could involve BLM routes. Two such routes are: Christmas Valley and Lakeview to Steens Back Country Byways. The concept was to take advantage of existing programs to expand visitor recreational experience in Lake County by adding the above two byways as two new "tour" routes. There is support with the Federal Fish and Wildlife Service to include Hart Mountain in such designation.

C. Visitor Rest Stops

The Outback interpretive plan specifically includes a site for a visitor's rest stop called Scott's Grove. The idea was for BLM and ODOT to form a partnership to provide a pit stop similar to Highway Well. Although such site development is a long way into the future, it may be possible within your planning time span and with your support.

D. Sites With Exemplary BLM Resource Management Programs

(1) Lake Abert and Abert Rim

In developing the management plan and the interpretive program for Oregon's Outback NSB, a number of concepts ~~was~~^{were} included that could benefit BLM management as exemplary programs.

These are:

Add a new state "tour" route along Highway 395 from Valley Falls to Highway Well particularly to take advantage of Lake Abert's Area of Critical Environmental Concern commitments and the potential wilderness area along Abert Rim. This would allow public education for the resource management programs taking place.

(2) Interpretive Sites

Along the same concept as (1) above, there are a number of individual interpretive sites that lend themselves to promote the BLM image as a good steward of public resources.

These are:

- (a) Tucker Hill site to interpret mining and range management,
- (b) Fort Rock Homestead Village to interpret paleontological and Native American heritage,
- (c) Oakman Flat to interpret wildlife management,
- (d) Table Mountain to interpret Native American heritage.

2. Concerns or Support Related to Other Non-Outback Interests

A. Warner Wetlands

I support your efforts to continue implementation of the recreation plan established for the area.

78-2: Nearly half of all Americans regard driving for pleasure as their favorite recreational activity. To provide new opportunities to meet this demand, the BLM created the National Back Country Byway Program. The Christmas Valley and Lakeview-to-Steens Back Country Byways were established as part of this national effort. Inclusion of these two BLM national back country byways as a State-designated tour route would be given consideration to support tourism opportunities in Lake County and enhance the experience of the visitors using public lands.

78-3: Under Alternative D, the preferred alternative, development of a picnic area at milepost 34.5 on Highway 31 (the location you refer to as Scott's Grove) could be considered. Potential facilities could include picnic sites with tables, vault toilets, and kiosks for interpretation of resources and history within the North Lake Special Recreation Management Area. Future development of these facilities would be dependent upon funding and the development of partnerships with other agencies (Federal, state, and local), as well as private entities. A commitment by all potential partners in the long-term maintenance and upkeep of any facilities would be an integral part of facility development.

I am particularly interested in your continued plans to protect and manage the resources at Campbell Lake. It appears to me that severe damage and human pollution is occurring along the eastern side of the lake and across the acquired lands.

I also believe that, with little effort, the road to the lake's east side and a car-top boat launch could be provided. I also strongly recommend that the fence be replaced and the off-highway trail that is being pounded in toward the southern outlet be closed. I also recommend that the ORV closure be enforced; foot access is all that is needed.

B. Wilderness Study Areas

I recommend that BLM and the Department of the Interior take aggressive action to resolve the interim wilderness study areas situation with Congress. Your current passive role will eventually cause a conflict with future proposals, such as Highway 140E realignment.

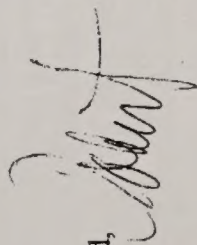
I could not find fire management direction for the wilderness study areas. I would expect, at a minimum, a blanket statement regarding hand versus mechanical attack guidance.

C. Maps

The maps, as support for the RMP, are excellent. They helped me understand where your various actions are located.

In closing, I thank you for your continued support of Lake County Chamber of Commerce. I would like to form a new partnership with you and the Chamber to develop a new fishing map handout using your mapping skills, as shown in this draft. The current handout on fishing in Lake County is poor and needs to be updated.

Robert H. Lund,
947-3977



78-4: Within the Recreation Resources, Actions Common to All Alternatives section, the BLM states that the designation of scenic byways or vehicle routes would be considered in the future, provided they are consistent with OHV designations and other resource concerns are addressed. The addition of a State tour route along Highway 395 from Valley Falls to the Highway Well Rest Area has merit, and we would consider supporting a proposal for this designation within the parameters listed above and subject to compliance with other laws and regulations (i.e., NEPA).

Your comments regarding the potential for developing interpretive sites at Tucker Hill, Fort Rock Homestead Village, Oakman Flat, and Table Mountain (commentor probably means *Table Rock*) are noteworthy. Interpretive sites already exist at the Fort Rock Homestead Village and near Table Rock. We would consider any proposals regarding additional interpretive opportunities at existing sites as well as newly proposed locations.

78-5: Upgrading this road and constructing a boat ramp would be considered as necessary for resource protection; the text has been clarified to reflect this. The trail you refer to is not a designated vehicle route and has been posted closed to vehicles. Staff are aware of this closure and check the area as often as possible; however, as you note, the fence has been repeatedly cut and the closed signs driven around or vandalized.

Dear Sir

I enjoy visiting your state every summer, I am opposed to any plan to limit ATV use in the Lakeview area. The entire area should be left open to ATV use & the sand dunes should also be left open since we do not need 1 more acre of land wasted on wilderness. Grazing & mining should be expanded not decreased since they create jobs for the people of Oregon. Thank you for reading my comments.

Sincerely

Barry Kays

RECEIVED

JAN 24 2002

LAKEVIEW, B.L.M.

L-79

RECEIVED
JAN 24 2002
LAKEVIEW, B.L.M.

Jan 21, 2002

Dear Mr. Sykes,

I'm writing to comment on the Lakeview Resource Management Plan. I frequently visit the area and love the space and recreational opportunities. I would like to suggest a strengthened Alternative C, to exclude livestock grazing and offroad vehicles from areas of concern and the wild and scenic river areas.

Sincerely,

Celen Reguerra
600 N.E. Royal Ct
Portland 97232

Dennis P. Kenny
8240 S.W. Parway Dr.
Portland, Or. 97225

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Or. 97630

RECEIVED
JAN 24 2007
LAKEVIEW, B.L.M.

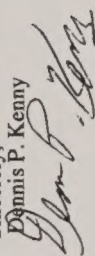
Sir:
It has come to my attention that your agency is taking comments regarding its Resource Management Plan. I wish to add my voice.
"Adaptive Management," the concept upon which your Alternative D is based, is an inherently weak-willed management style. It is designed to be "adaptable" so that any decisions made under its authority are not solidly enacted. This will most certainly lead to further degradation of the Great Basin areas that deserve concrete protection. We need objective standards and guidelines to protect this delicate eco-system from the ravages of cattle grazing and the rampaging of off road vehicles.

One need only witness the degradation of the Hot Springs Campground on Hart Mountain over the past ten years or so to know that, as the high desert becomes more popular to the masses, the degradation has to be controlled more forcefully than your Alternative D allows. This campground has become such a sorry site that I can't even stand to go there anymore.

Alternative C is the closest to being a solid management plan. It could stand to be improved by setting reasonable caps on livestock grazing and limiting use of off road vehicles. The high desert has tried to adapt long enough to these types of uses. It bears the scars of its losing battle. It is up to the BLM to solidly protect what is left. Thank you for your attention.

Sincerely,

Dennis P. Kenny



81-1

P.S. I was out at Steen's Mt. Last fall and was impressed with the improvements there. It is unfortunate that you can't do anything about the sheer ignorance of some of the campers, particularly at Page Springs campground, which, despite the pleasant location, seems to attract an unhealthy number of people who have no idea that most people (I believe) go camping to enjoy the peace and quiet.

81-1: The Burns District is responsible for the management of the Steens Mountain area. Your comment should be directed to the recreation staff at that office.

Jan. 22, 02

Dwayne Sykes
BLM - Lakeview Dist. Office
Lakeview OR. 97630

Dear Mr. Sykes,

RECEIVED
JAN 24 2002
LAKEVIEW, B.L.M.

Please reject Alternative D. A strengthened Alternative C is the land's best bet. However it fails to set reasonable caps on livestock grazing. The success of wise management of live-stock grazing has proven itself over and over. Recovery of the land has been a joy to witness - land which then can function as a resource for erosion control, fish recovery, habitat restoration. Can there be any hesitation ^{as} regarding such protections?!

Also, to give ORV's - even limited use on more than 3 million acres threatens the success of Alternative C. Perhaps I've only seen the irresponsible ones - or witness damage they've left behind - but that is a reality. With no means to police that vast area, the BLM is inviting bad things to happen.

If it is the BLM's intent to truly protect these 3.2 million acres for future generations, Alternative

"C" must be a strengthened one, with realistic protection, given the land from over-grazing and watershed damage - and vastly contained ORV entry to the area.

Thank you for your consideration. Together we've made good progress. Please let's not leave the door open to further resource degradation. To give Oregon's magnificent desert wildlands no-nonsense protection is a very worthy goal.

Thank you for this chance to express my concerns.

Sincerely,

Nancy Lou Tracy
7310 SW Pine St
Portland OR 97223

Sorry - Both computer + typewriter
are out of order. My apologies!

Carol L. Steele
16037 S.E. Brooklyn Street
Portland, Oregon 97236
503-761-4545

January 21, 2002

Dwayne Sykes
BLM Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Subject: Lakeview Resource Management Plan

I will try to keep my comments brief; in short I urge the BLM to reject Alternative D and adopt a strengthened Alternative C that restricts livestock grazing and off-road vehicles from proposed wild & scenic rivers, key fish and wildlife habitat, especially sage grouse leks,, wilderness study areas and grazing allotments in "fair" or "poor" condition.

I don't know what is meant by "adaptive management", but it sounds like more of the same old policies of the past that have caused continued destruction of the range and wildlife habitat. ORVs should specifically be excluded from the Lost Forest Area and the Sand Dunes Wilderness Study Area. I have seen too much damage from off-road vehicle use throughout the desert west, and think such activity should be severely restricted.

Again, I am distressed to see that so much livestock grazing is allowed to continue year after year. Overgrazed areas take a long time to recover after livestock are removed. Moreover, looking at the operations from a standpoint of agricultural efficiency, open range grazing in the arid West produces very little meat that goes to the consumer.

Thank you for your consideration.

Carol L. Steele

Carol L. Steele

January 16, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

RECEIVED
JAN 24 2002
LAKEVIEW, B.L.M.

Dear Mr. Sykes,

We would like to comment on the Lakeview Resource Area Management Plan. Our family has enjoyed the natural setting of southeast Oregon for many years. The area is very important to us. It is also home to many species of birds and animals. The decisions you make affect us all.

Specifically, we would like the BLM to choose Alternative C instead of Alternative D. It is important to us for BLM to do the following:

Limit Off-Road Vehicle use across the entire Lakeview Resource Area. No public lands should be open to the devastation caused by cross-country travel of ORVs. They are really destructive. Exclude ORVs from the Sand Dunes Wilderness Study Area and Lost Forest Area of Critical Environmental Concern where they are causing big problems right now.

Recommend Wild & Scenic River status for three streams and manage them in that way.

Close 500 miles of roads in Special Management Areas, and all roads in riparian areas.

Add 1194 acres to existing WSAs.

Add 20,000 acres to four current and 130,000 acres to 12 new ACECs.

Reduce grazing by a minimum of 20%; exclude it from riparian areas totally.

Close a large percentage of the area to energy and mineral extraction.

Limit the number of Special Recreation Permits as needed to protect natural resource values.

As parents of two young children, we are mindful that we must take care of what we have for future generations. We hope you share this value, and your agency can move in this direction.

Thank you for your consideration,

Nick Forrest

Nick Forrest

Holly Forrest

Holly Forrest

9302 NE 82nd Avenue
Vancouver, WA 98662
360 891-0929

Jan, 19, 2002

Mr. Duwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes: Re: Oregon High Desert

Please reject Alternative D and instead choose a strengthened Alternative C that excludes livestock grazing and off-road vehicles from:

Proposed Wild & Scenic Rivers

Critical fish & wildlife habitat

Sage grouse leks

Areas of Critical Environmental Concern (ACECs)

Areas of Critical Study Areas (WSAs)

Wilderness Study Areas in "fair" or "poor" condition

Grazing allotments in "fair" or "poor" condition
While Alternative C comes much closer to meeting the Lakeview RMP's goals, it fails to set reasonable caps on livestock grazing and allows the use of ORV's on more than 3 million acres of the planning area (only 40,500 acres would be entirely closed to ORV's). To protect these 3.2 million acres for future generations, we must choose a strengthened Alternative C.

Sincerely,

Norothy J. Layman
10820 SW Meadowbrook #63
Tigard OR 97224-3979

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Dwayne:

19 January 2002

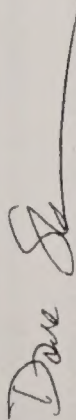
I am writing to comment upon the Draft Lakeview Resource Area Management Plan. I strongly urge the BLM to chose Alternative C. The reasons for this are many, and include the following:

- * Alternative C would designate zero acres as Open to cross country travel by ORVs.
- * Exclude ORVs from the Sand Dunes Wilderness Study Area [WSA] and Lost Forest Area of Critical Environmental Concern [ACEC], where they currently are wreaking havoc.
- * Recommend Wild & Scenic River [WSR] status for three streams and manage them as such.
- * Close 500 miles of roads in Special Management Areas [WSAs, ACECs, and WSRs].
- * Close all roads in riparian areas.
- * Add 1194 acres to existing WSAs.
- * Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- * Reduce grazing by at least 20% and exclude it from riparian areas entirely.
- * Close a high percentage of the area to energy and mineral extraction.
- * Limit the number of Special Recreation Permits as needed to protect natural resource values.

As an outdoor enthusiast, I am tired of special interest groups, including ORVs, running rampant over the shared natural heritage of this nation. Although there is a place for such vehicles, the vast majority of public land is already available to such vehicles. Establishing an area where they are not allowed to travel cross country is not only best for the ecosystem itself, but for the democratic ideals of the country.

Thank you for your consideration of these comments. Please do not send me your final decision, as I prefer to access such information through the worldwide web.

Sincerely,



Dave Sherman
Box 874
Flagstaff, AZ 86002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Dwayne:

19 January 2002

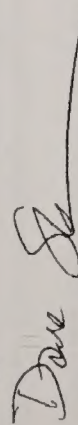
I am writing to comment upon the Draft Lakeview Resource Area Management Plan. I strongly urge the BLM to chose Alternative C. The reasons for this are many, and include the following:

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- * Add 1194 acres to existing WSAs.
- * Add 20,000 acres to four existing ACECs and add 130,000 acres to 12 new ACECs.
- * Reduce grazing by at least 20% and exclude it from riparian areas entirely.
- * Close a high percentage of the area to energy and mineral extraction.
- * Limit the number of Special Recreation Permits as needed to protect natural resource values.

As an outdoor enthusiast, I am tired of special interest groups, including ORVs, running rampant over the shared natural heritage of this nation. Although there is a place for such vehicles, the vast majority of public land is already available to such vehicles. Establishing an area where they are not allowed to travel cross country is not only best for the ecosystem itself, but for the democratic ideals of the country.

Thank you for your consideration of these comments. Please do not send me your final decision, as I prefer to access such information through the worldwide web.

Sincerely,



Dave Sherman
Box 874
Flagstaff, AZ 86002

Patricia Dowd
PO Box 25
Centennial, WY 82055
January 22, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to give my support to the Bureau of Land Management's (BLM) Alternative C option for the Draft Lakeview Resource Area Management Plan. Alternative C would protect fragile habitat from the damage caused by Off-Road Vehicles (ORVs) and therefore, should be selected as a management alternative.

Alternative C is the best alternative because it would designate zero acres as "open" to cross country travel by ORVs and would close all roads in riparian areas. These two changes to management practices as usual are critical in protecting the natural values that make the Lakeview Resource Area so special.

I support the proposal to exclude ORVs from the Sand Dunes Wilderness Study Area [WSA] and Lost Forest Area of Critical Environmental Concern [ACEC] because currently these two areas are being damaged by irresponsible ORV use.

Alternative C would help restore and protect natural qualities and unique attributes that make the Lakeview Resource Area biologically and culturally special and therefore should be selected as the management plan for the Lakeview Resource Area.

Thank you for considering my comments and for protecting BLM land for future generations to enjoy.

Sincerely,

Patricia Dowd

RECEIVED
JAN 25 2002
LAKEVIEW, B.L.M.

Dwayne Sykes
BLM - Lakeview District
HC 10 Box 337
Lakeview

Dear Mr. Sykes,

I'd like to express my support for alternative C in the Lakeview Resource Management Plan. I'd like to see this alternative do more to keep ORVs to a smaller territory - it takes a long time for land to spring back after only being run over a single time by such vehicles. Could we keep ORVs and cattle out of wild and scenic rivers and critical wildlife areas (i.e. sage grouse leks)? Thanks for reading.

Sincerely,
Debra Burke
Box 1331
Bend, OR 97709

21 Jan 82

Dwayne Sykes
BLM - Lakeview Dist.

Dear Sir,

We must begin to decrease the degradation of sensitive areas by overgrazing on off-road vehicles. Please reject Alternative D and choose & strengthen Alternative C. Livestock grazing and ORV use must be prohibited from environmentally sensitive areas,

Respectfully,

R. J. Schuerman

Mr. Ronald F. Schuerman
1151 Reiten Dr
Ashland, OR 97520

January 24, 2002

Dwayne Sykes, RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

Thank you for the opportunity for input on the Draft Lakeview RMP/EIS. My comments are as follows:

1. The proposed Hawksie Walksie ACEC/RNA is inadequate to protect the significant botanical, cultural and wildlife values in that area. The currently proposed ACEC boundaries do not include known sage grouse nesting areas nor do they include identified nesting sites for ferruginous hawks. At the very least, the ACEC should be expanded to include the mountain mahogany grove above Mahogany Spring and the entire basin draining the southern slopes of Acty and Hawk Mountains, as well as the important sage grouse habitat in the Sage Hen Hills WSA. Administratively it would make the most sense to designate all of the Hawk Mountain WSA within the Lakeview District, plus the Sage Hen Hills WSA, as a single contiguous ACEC and to close all ways to motorized vehicles.

90-1

90-1: The Hawksie-Walksie proposed ACEC/RNA boundary is based on the presence of Natural Heritage native plant communities or "cells" (botanical values) and cultural values. These values were identified by a team of evaluators (BLM and Oregon Natural Heritage Program). The plant cells meet the relevance and importance criteria for plants, but only within the smaller areas where they occur. These areas were identified in Vander Schaff (1992) as Hawk I and Hawk II. They consist of high quality bunchgrass lands (6,720 acres). The effects of grazing on these native grasslands need to be monitored over time (see Appendix R). The Hawksie-Walksie Basin connects the Hawk I and II areas and was included within the proposed ACEC for cultural values; while these resources occur elsewhere in the Beaty Butte Allotment, the antiquity, degree of diversity, or concentration of cultural materials within the remainder of the allotment do not meet the criteria for ACEC designation. Most of the Beaty Butte allotment was previously considered for ACEC designation as part of the Pronghorn ACEC proposal (ONDA 1998; USDI-BLM 1999b). Refer also to the discussion in the Lakeview Proposed RMP/ Final EIS.

The Hawksie-Walksie ACEC/RNA was not proposed with special management to protect greater sage-grouse habitat and ferruginous hawk nesting sites. Current greater sage-grouse interim management guidelines are being used to protect greater sage-grouse habitat and the long-term strategy, when completed, will guide future management. The greater sage-grouse habitat within the proposed Hawksie-Walksie ACEC/RNA is no more unique than other habitats found throughout the resource area. Ferruginous hawks can be protected through the adherence to the raptor stipulations found in the document. This would protect the nesting birds from disturbance during the critical nesting/fledging stage.

A fence could be constructed along the western boundary road of the WSA (BLM 6176) and tied into the existing fence along the Hawk Valley Seeding to exclude livestock grazing from the ACEC. (This would require less than 20 miles of fencing compared to 32 miles of fencing for the currently proposed ACEC.)

2. Expand the Guano Creek/Sink Lakes ACEC/RNA to the boundaries of the Guano Creek WSA.

3. Change the Preferred Alternative to Alternative C, as this alternative more effectively addresses the protection of values important to the broadest segment of the public. From reviewing the Management Goals enumerated in Chapter 4 (Environmental Consequences) of Volume 1 of the Draft RMP/EIS, it is clear that the attempts to accommodate commodity uses such as grazing and mining which, by the way, generally cost the public more in administrative costs than are realized from revenues, significantly compromise the achievement of stated goals relating to soils, plant communities, control of noxious weeds, watershed health, fish and aquatic habitat, special status animal species, cultural resources, and visual resources.

Again, thank you for the opportunity to comment on the Draft RMP/EIS. Please incorporate these comments into the final Lakaview RMP/EIS.

Sincerely,
Elaine Rees
440 W. 17th
Eugene, OR 97401
(541) 683-2147

January 20, 2001

Here are my comments re the Lakeview Resource Management Plan

I find the preferred Alternative D inadequate because it fails to call for any reduction in livestock grazing and leaves almost all of the Resource Area still open to destructive ORV use.

Please choose a strengthened Alternative C that excludes livestock grazing and off road vehicles from ACECs, WSAs, sage grouse leks, proposed Wild & Scenic River corridors, other critical fish and wildlife habitat as well as grazing allotments in "fair" or "poor" condition.

I am particularly concerned about the destructive impact of ORVs in the Sand Dune/ Lost Forest WSA. When I was there last spring I saw many treadmarks of ORVs going right past the signs marking the boundary of the WSA toward the forest. These incursions were so numerous that it looked to me as if little effort has been made by the BLM to stop them.

Peggy Robinson
Peggy Robinson
2090 Harbor Dr.
Springfield, OR 97477

January 19, 2002

To: Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, Or 97630

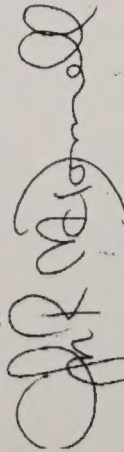
Dear Mr Sykes,

I am writing this letter to recommend that you chose Alternative C in your Resource Area Management Plan.

As an eastern Oregonian, I realize the importance of taking care of a fragile ecosystem such as Oregon's high desert. Without monitoring and restricting some areas within your district, we as humans will either intentionally or unintentionally love it to death. I am especially concerned with watersheds and the invasion of non-native species caused by excess road and cattle traffic. Stream quality is also a concern of mine, knowing we are currently still under for snow pack in our mountains. What water we have must be treasured, and kept clear and cold to prevent diminishing fisheries and water quality. Wild and Scenic status would assist in a rehabilitative process in three of those streams. Extremely fragile, unique areas such as the Sand Dunes WSA and the Lost Forest should drastically minimize off-road traffic, so that others in the future will be able to appreciate these high desert phenomenas.

Thank you for considering my opinion in this matter.

Sincerely,



Charlyn McDonnell
34001 Burnt Ranch Road
Mitchell, Oregon 97750

Dear Sirs,

Jan 22

I have read an outline of your five alternatives of the Lakeview Resource Management plan, and I understand you are leaning towards Alternative D.

I believe that deep in our hearts we know that the best thing for future generations is to protect the land, the rivers and our fellow creatures.

The adaptive management idea is no good without constant supervision.

Please choose Alternative C, plus

stronger caps on grazing and off road
vehicles.

LAKEVIEW, B.L.M.

JAN 25 2002

RECEIVED

Sincerely,

Jane H. Meyer

David A. Meyer

©1983 JANE HART MEYER

Attention: MP Team Leader

JAN 20, 02

JAN 28 2002

Dear Mr. Sykes,

LAKEVIEW, B.I.M.

It has come to my attention that the B.I.M. is
intertaining the idea of closing another 412 miles
of public access roads to public lands, much of
it in Lake County. I own a number of pieces
of land in Lake County adjacent and/or surrounded
by B.I.M. lands, and of course, I am concerned about
any further closure of B.I.M. roads. Not only
might that restrict me and others from using
presently existing B.I.M. roads to get to our
properties the easiest way possible, but is
going in the direction of eventually in future
management programs of excluding altogether
any motorized access to our properties. And
this is not to mention the multitudes of
people that use these existing B.I.M. roads to
take them to areas where they can participate
in lawful activities they enjoy doing or
profit from economically.

I feel a more constructive and economically
beneficial approach to the ultimate goal of
preserving areas in a pristine state would be to take
from the already existing study areas, of which
there is an already over abundance of, and close

TEA

94-1

94-1: Please see response to comment 70-6.

L-94

②

them off for future generations. I do not mean all the existing study areas because there already exists far more vast study areas than could ever be needed or used for such a project and managed properly. And it would be unjust to ask the American public to fund such a huge and wasteful use of their lands. Then after selecting and closing off roads in the already existing study areas, in the remaining B.L.M. lands, construct and develop more roads so more people can have the opportunity to enjoy their public lands and at the same time contribute more to the local economies where they would need services.

By using available resources for the development of this type of program I suggest, would be to use existing finances more constructively than creating a more costly and unmanageable program as the B.L.M. suggests that would not benefit society as a whole, but rather be a very costly and wasteful use of public land and finances with no benefit to the general public.

I would appreciate if you would send me maps and other material

(3)

you have on this proposed project.

Thank you for your time.

Ar

ARON ANDERSON
LITTLE RENO RANCH
P.O. B. 141
RAINIER
OREGON 97048

20210 Mountain View Dr
Bend OR 97701
January 23, 2002

RECEIVED

JAN 28 2002

LAKEVIEW, B.L.M.

Dear Mr. Lykes,

We are appalled by the extensive use of off-road vehicles in the Lost Forest area. We are not hunters, but have learned from hunting friends that deer habitat is much improved where livestock grazing has been eliminated ~~where~~ in areas of southeast Oregon. We feel that it is very important for the BLM to protect sensitive desert lands for us humans who delight in the natural environment and for animals who are unable to protect themselves from our consumption oriented society.

Specifically we refer to the Lakeview Resource Management Plan. We encourage you to reject your preferred Alternative D and replace it with an alternative that severely limits or prohibits livestock grazing and off-road vehicles from Wild & Scenic Rivers, Sage House



Environmental Concern and Wildlife Study areas. We understand that stronger statements in Alternative C would better protect these sensitive habitat areas.

We as a citizenry have not been concerned about the high desert because it seems so vast. But many of us are learning that it is a sensitive place that needs for a knowledgeable care and protection. We need the Alternative C provisions to exclude livestock from riparian areas, limit ORV use, designate Wild & Scenic River status to as ~~many~~ many as streams as possible, close as many roads as possible, and put as many acres as possible into WSA's and ACEC's. We individuals can't do this so we must rely on government bureaus like BLM to always remember to do the greatest good for the greatest number and that number includes future generations. We cannot continue business as usual, but must take major steps to be serious about protecting Oregon's wonderful desert.

Cordially,
Charles & Elouise Mattox
Charles & Elouise Mattox

January 22, 2002

Wayne Sykes
BLM - Lakeview District Office
HC 10 BOX 337
Lakeview, OR. 97630

Dear Mr. Sykes:

A time is coming for you to be involved in an opportunity to update your Wilderness recommendations for the Lakeview Resource Area. You have a great deal of power in your hands, and it should be used wisely and with thought for the future, not the pressures of today. Our environment and wildlife are not things like Off-road vehicles..fads that will be replaced with new fads. They cannot be replaced once damaged beyond a certain point or driven to extinction. ORV's damage every inch of earth they travel on..they are not for gentle use: they frighten humans who are not on them, as well as wildlife; and they cause more air pollution than regular cars. They damage river banks, new forest growth, roads that are present, and habitat for wildlife. This damage is often permanent..for the momentary pleasure of a few daredevil people. And while they're damaging this precious land, these vehicles are sucking up fuel and spewing pollutants. It's just not good sense to allow this in fragile areas.

I would ask that you choose Alternative C. PLEASE do NOT choose Alternative D. Our public lands should not be sacrificed for the grazing of private livestock. ORV's should find private lands to race about on..not proposed Wild and Scenic Rivers, critical Fish and Wildlife Habitat..nor Sage grouse mating habitat..nor Areas of Critical Environmental concern, wilderness study areas, or grazing allotments in "fair to poor" condition. These areas need YOUR PROTECTION and care so that they might return to their original beauty and health. This is what "Land Management" is all about..not giving in to industrial pressures and livestock owners requests. Our public lands are not designated for "ranch subsidies", or to support sport vehicles.

Please tell the BLM "adaptive management" is NOT a substitute for objective and well thought out guidelines. Adaptive Management without constant on-ground monitoring can only lead to further degrading of the environment.

I urge the BLM to take this "once-in-every-twenty-years" opportunity to update your wilderness recommendations for the Lakeview Resource Area. The lands under are control are also supposed to be under your "CARE"....no one else can make as big an impact on this beautiful area that is so threatened. Use this power you have to protect this area for EVERYONE..FOREVER. Don't let industry pressures affect the job you are hired to do for all of us..our lands..and our wildlife. Thank you...

Florence Wagner

Florence Wagner

P.O. BOX 312
Lopez Island, WA. 98261
flojac@interisland.net
360-468-2541

LAKEVIEW BLM.

REGENT EMERITUS
ALLAN R. SORENSON
THE UNIVERSITY OF MICHIGAN



345 IVY GLEN DRIVE
EUGENE, OREGON 97402-3169

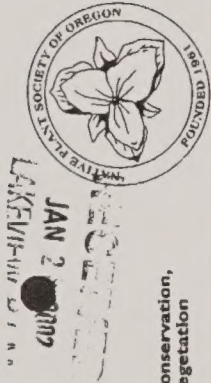
24 January 2001

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630
Subject: Lakeview Resource Management Plan

Dear Mr. Sykes:

Because of my great interest in mili-
mizing livestock grazing and off-
road vehicles on the subject lands,
I urge you to consider Alternative
C, revised for greater force for
those two factors, i.e., greater
restrictions for those two factors.

Sincerely,
Allan R. Sorenson



THE NATIVE PLANT SOCIETY OF OREGON

Dedicated to the enjoyment, conservation,
and study of Oregon's native vegetation

Jan 25, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Sir:

We wish to provide comments on the Lakeview RMP/EIS on behalf of the High Desert Chapter of the NPSO. We have comments in several areas.

Special Management Areas (ACECs, RNAs, WSAs, etc)

We strongly support the designation of all the proposed areas. In general, these areas should be off limits to grazing. They are usually set aside for plant community values and grazing increases the chances that these communities will be degraded. These SMAs represent a very small fraction of the District and a smaller fraction of the AUMs available. The Lost Forest RNA should be closed in winter and closed to camping. ORVs should be eliminated from it and the other SMAs. We don't believe that recreation is a recognized use in RNAs. The High Lakes ACEC should be extended all the way north to the Hart Mountain Refuge.

There should be no road improvements made in special management areas.

No grazing or ORVs should be allowed in the Black Hills ACEC/RNA and this special area should have a high priority for fencing. Comley Hills is set aside for grass cells and should be protected.

We have seen pygmy rabbit sign in the areas just south of Jacobs Reservoir and this area should be protected in the High Lakes ACEC.

ORV activities in the Fossil Lake Sand Dunes are having disastrous consequences on vegetation and dunes, and therefore should be prohibited. Fossil and archeological resources are being damaged.

Rare Plant Species

NPSO has recently discovered a sensitive species (*Agastache cusickii*) in the High Lakes ACEC. Further surveys should be done for this plant and protection from ORV and grazing impacts assured.

General Management Activities

There should be no further water development in pristine playas.

More attention should have been paid to Sage Grouse habitat.

Guano Creek should be nominated and managed as a Wild and Scenic River.

Shirk Ranch not being protected. It should be maintained as the important historic site it is and should be at least fenced out from cows.

The impact of grazing and ORVs on the spread of weeds is inadequately addressed.

Fire rehab plans should include only revegetation with legitimate natives from seed stock from the area.

You are degrading the land further by revegetation with "exotics."

21663 Paloma Drive • Bend, OR 97701 • 503-389-6981

98-1: Recreation, scientific studies and research, education, and other uses are all appropriate in an RNA, provided such uses are consistent with the purpose of the area (the regulations covering RNA management do not specifically prohibit any use). In all instances, mitigation may be imposed to reduce the potential for negatively impacting the values for which the RNA was designated. A number of mitigation measures have been proposed to protect the relevant values for which the Lost Forest RNA was designated. Three campsites within the interior of the RNA would be closed to overnight camping, while camping would continue to be allowed at four existing campsites along the edge of the RNA. Additional roads would be closed (Table 4-4; Map SMA-9). The main access road (6151-0-00) into the Lost Forest could be closed in the future during seasonally wet periods to prevent resource damage, if necessary. Fossil Lake is closed to all vehicle use (Table 3-3). This closure area would be expanded under the preferred alternative (Map SMA-9a).

98-2: The boundary of the Guano/Sink Lakes RNA has been expanded to be equal to the WSA boundary (Map SMA-16). This includes and expands the plant cells of big sagebrush, needle-and-thread grass, and silver sagebrush/Great Basin wildrye plant communities. The riparian plant community is also enlarged, thus increasing the protection of connectivity between lowland and highland communities. The High Lakes ACEC has been expanded to the north to connect to the Hart Mountain National Antelope Refuge; this area contains the same cultural resource values as the rest of the proposed ACEC and protects a travel corridor from the refuge through the ACEC to the south for wildlife, such as mule deer, greater sage-grouse, and pronghorn antelope.

In summary we urge you to choose a strengthened Alternative C. Alternative C comes much closer to meeting the Lakeview RMP's goals and objectives by excluding livestock from all riparian areas, designating no acres as "open" to cross-country off-road vehicle use, recommending all eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern and designating twelve new ACECs, and limiting energy and mineral extraction throughout the planning area.

The BLM should exclude livestock grazing and off-road vehicle use from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, all ACECs and Wilderness Study Areas, and grazing allotments that are not meeting management objectives.

In addition, this RMP must include objective standards and guidelines so that its success over the next two decades can be adequately gauged. Reliance on "adaptive management" may only lead to further resource damage, as BLM lacks the staff and funding to perform the constant monitoring that adaptive management requires.

Please keep us informed of progress on this important process.

Sincerely,

Stuart H. Garrett MD

Stuart Garrett, MD
Pres, High Desert NPSO

98-3: On page 4-31 of the Draft RMP/EIS, it states that any resource activity or management action that results in ground disturbance could increase the risk of weed invasion and establishment. Particular activities, including livestock grazing and motorized vehicle use, are addressed as being contributors to weed introduction.

98-4: Within the decision-making process for revegetation after fire or disturbance, the primary goal is to protect the soil resources, especially the A horizon. The ecological site inventory data helps determine potential vegetation for rehabilitation, and therefore, possible success; native seedlings often are more difficult to establish depending on the aspect of site, elevation, and precipitation regime. There is a present trend to plant crested wheatgrass to minimize soil erosion and later go back into the area and reintroduce natives. This is a costly and long-term investment (also see response to comment 17-12 and page 2-45 of the Draft RMP/EIS). Often cost and availability of native seed have limited their use (see also response to comment 17-12). It is also imperative to evaluate the establishment of a crested wheatgrass seeding in terms of synecology (the study of community functioning and niche functions of plant populations in an ecosystem context) and disturbance regimes in sagebrush, as interpreted by West (1999). See Figure 4-1 for a diagram of dynamics of sagebrush steppe and crested wheatgrass.

It is not always possible to obtain native seed for fire rehabilitation purposes. Sometimes they are exceedingly expensive. In such instances, some type of desired seed needs to be applied to the disturbed site within the first year to protect soils from erosion. Loss of the productive A horizon may prevent the restoration of native vegetation. Sometimes the seed stock may come from the local area or other areas, depending on the seed companies.

JAN. 21, 2002

Mr. Duwayne Sykes
Lakeview BLM
Lakeview, OR 97630

Dear Mr. Sykes:

I am writing you as a livestock rancher who has been raising sheep flocks for over a quarter of a century. I would like to comment on the Lakeview Resource Management Plan for future development of the millions of Federal lands in Lake and Harney Counties.

First of all, I have spent time in these areas for recreational purposes, but haven't grazed animals there.

Second, as an experienced livestock rancher, I recognize that the present levels of livestock grazing there are too high. You can see it by the lack of trees ^{and bushes} in the riparian zone - we, over in the western side of the state, are informed by our watershed Councils that riparian areas are necessary for good stream structure and cooler stream temperatures, which are needed for fish spawning requirements. So, I cannot support your alternative D because you do not recognize that high densities of livestock do a lot of damage.

Third, an alternative which protects stream margins is much preferable. I SUPPORT ALTERNATIVE "C". By the way, roads in riparian areas are just as bad as livestock. There should be fewer roads in general, but especially in riparian areas.

Please let me know by return mail why you chose alternative D as better than C. I can't understand this.

Thank you,

Amy Schoener

AMY SCHOENER
24362 Cardwell Hill Dr
Philomath, OR 97370

7907 Southeast Roslyn Street
Milwaukie, Oregon 97222-1052

Ken Snider

503.775.5746
snider@quik.com

1 PAGE VIA FACSIMILE TO:

541-947-6399

COPY VIA USPS TO FOLLOW

28 January, 2002

Mr. Dwayne Sykes
RMP Team Leader
BLM Lakeview District
HC 10 Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes, I write to comment on the Lakeview District Resource Management Plan. After reviewing the document I want to express my support for Alternative C.

Too many people take a cavalier and thoughtless approach to the use of our public lands. In particular, I see too many Off Road Vehicle (ORV) users abuse the land and support a ban on cross-country travel by ORVs, and use especially in the Sand Dunes WSA, and Lost Forest ACEC. In addition, close roads in and near riparian areas, and in Special Management Areas as well.

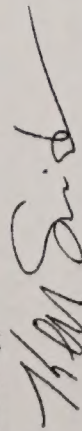
Mineral and energy extraction should be off limits on this sensitive land, and should only be permitted for the most crucial of reasons.

End grazing in riparian zones, and reduce grazing generally in allotment areas where the land is judged to be in poor or fair condition. Also end grazing near sage grouse leks as the destruction of natural habitat is a major contributing reason for its population decline.

I agree with the recommendation that the Wild and Scenic designation be applied to and managed as such for the streams where it is needed.

I appreciate all of the difficult and hard work you have put into this process and hope you will change the BLM's preferred alternative to Alternative C. Thank you for your attention to my comments.

Sincerely,



Peter Zacks
115-64 220 ST
Tampa, NY 11411

Wayne Sykes, RMP Team Leader
Lakeview BLM District Office
HC 10 Box 337
Lakeview OR 97630

1/23/82

Dear Team Leader Sykes

Alternative D fails to satisfy the Lakeview RMP's intent to adhere to sound ecosystem management principles. I urge you to Reject Alternative D and adopt a strengthened and improved Alternative C.

I urge you to recommend all 23 miles of river as Wild and Scenic River. Exclude grazing from riparian areas entirely and reduce grazing throughout the area. I urge you to close all 500 miles of road in Special Management Areas such as WSAs and ACECs.

I urge you to add 20,000 acres to the four existing ACECs and add 130,000 acres to the 12 new ACECs. I urge you to ban all ORV use from all WSAs. ORVs are destroying the Sinal Dunes WSA. Close all cross country travel by ORVs.

The BLM must make the protection of natural resource values a high priority of the RMP. Wilderness designation must be part of the Plan.

Sincerely: P. Zacks

January 25, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10, Box 337
Lakeview, OR 97643

Dear Mr. Sykes,

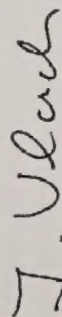
Thank you for the opportunity to comment on the Lakeview Resource Area Management Plan. Over the last 12 years I have spent many days exploring the area covered by this document. I have hiked in several WSAs (Spaulding, Hawk Mountain, Guano Creek, Diablo Mountain, Abert Rim, Devils Garden, Squaw Ridge Lava Bed, Sand Dunes and Four Craters Lava Bed); I have observed the wildlife, marveled at the wild flowers in the spring, viewed the rock art. It is a precious and fragile environment that needs to be protected from abuses.

In order to ensure that the planning area recover from past abuses and be protected from future ones, I urge the BLM to choose Alternative C. This alternative will limit ORV use across the entire Lakeview Resource Area, as well as close 500 miles of roads in WSAs, ACECs and WSRs. It will exclude these vehicles from the Sand Dunes WSA and from the Lost Forest ACEC - two areas where their use is highly inappropriate.

Under Alternative C water quality and aquatic habitat will recover more quickly than under the other alternatives because it recommends Wild & Scenic Rivers status for three streams as well as the closure of all roads and the exclusion of livestock in riparian areas.

Alternative C will increase the acreage of WSAs and ACECs besides offering other measures that will afford the area more effective protection and ensure the long-term health of its ecosystems. A significant percentage of the planning area will be closed to energy and mineral extraction, livestock grazing will be reduced by at least 20% and the number of Special Recreation Permits will be limited.

Sincerely,



Irene Vlach

Laurie Solomon
10935 NW 2nd St
Portland, OR 97231

Dwayne Sykes
BLM Lakeview District Office
HC 10 Box 97630
Lakeview, OR 97630

To whom it may concern,

Thank you for considering my comments on the Lakeview Resource Management Plan. This will affect 3.2 million high desert acres, which, as you are well aware, is not the type of ecosystem that is suitable for intensive cattle grazing or ORV use. In fact, the damage that has been done so far to many of these lands has been done almost exclusively by these two "uses" of public BLM lands.

Therefore, I urge you to take steps to reverse the damage done to Oregon's desert wildlands, and to take steps to improve these areas. This will not be accomplished by allowing the currently high grazing levels and ORV usage on these lands to continue unabated for the next twenty years. This can only lead to further degradation of the ecosystems you are managing.

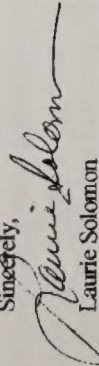
This idea of "adaptive management" your agency claims will occur, is not a substitute for objective standards and guidelines to follow when determining which areas will be allotted for cattle grazing or ORV use. These areas are slow to heal, and slow to change, as your agency is well aware. Sage, for example, takes so long to grow that one wildfire will change that ecosystem for many decades, if not forever.

Alternative C is the best option, although it falls short in some ways of what is needed to restore these high desert ecosystems and protect them from further degradation. The following areas should be excluded from livestock grazing and off-road vehicle use in Alternative C: Wild and Scenic Rivers, Critical Fish and wildlife habitat, Grazing allotments in "fair" or "poor" condition, Wilderness Study areas, and Areas of Critical Environmental Concern.

But many of these wild places are in a state of ecological red alert, thanks in large part to livestock grazing and off-road vehicles. The bulk of the Lakeview Resource Area's 3.2 million high desert acres are wholly unsuited to cattle grazing or ORV use, yet the BLM's preferred management alternative does virtually nothing to change the status quo. In fact, the BLM recommends no change in current grazing levels or ORV usage for the next two decades. This kind of short-sightedness is akin to mismanagement of our shared natural legacy.

Thank you for your consideration, I expect your timely reply.

Sincerely,


Laurie Solomon

LAKEVIEW, B.L.M.

JAN 28 2002

RECEIVED

10985 Dyerville Loop
Myers Flat, CA 95554
January 22, 2002

Re: Lakeview Resource Management Plan

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

My comments on the Lakeview RMP focus on the damage that is currently occurring from livestock grazing and ORV use. Unfortunately, your preferred Alternative D does not recommend any changes to current grazing practices or ORV use for the next two decades. Instead, you should adopt an improved Alternative C that excludes livestock grazing and ORV use from all environmentally sensitive areas such as:

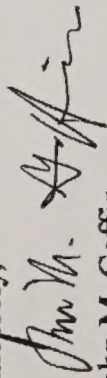
- a) Areas of Critical Environmental Concern (ACECs)
- b) Proposed Wild and Scenic Rivers
- c) Critical fish and wildlife habitat
- d) Wilderness Study Areas (WSAs)
- e) Sage grouse leks (i.e., mating areas)
- f) Grazing allotments in "fair" or "poor" condition

You have stated the intention to use "adaptive management". Adaptive management has no scientific credibility in the absence of a thorough monitoring program. You have ~~not~~ presented no evidence that the resources will be available to implement such a careful monitoring program. Therefore, to avoid the likelihood of continued resource degradation it is essential that you establish objective standards and guidelines for resource management.

The development of the Lakeview RMP is an opportunity to update the wilderness recommendations for the Lakeview Resource Area (LRA). Many existing recommendations regarding potential designations for

wilderness status need to be reassessed in view of changed circumstances and expectations since previous assessments occurred. In some cases the rationale provided for a non-suitable recommendation was based on potential or planned projects - such as powerline construction, geothermal exploration, intensive range projects, and mineral development - that may or may not remain viable, or desirable some 15-20 years later.

Sincerely,



John M. Gaffin

Mr. Duane Sykes, RMP Leader
Lakewood, B.L.M.
JAN 29 2007
RECEIVED
Lakewood, OR 97630

Dear Mr. Sykes,

I would like to take this opportunity to comment on the Lakewood Resource Area management plan. I am interested in stressing the problems with Alternative D; it appears not to limit off road vehicle use which devastates the fragile ecosystem, is noisy and a bad way to appreciate the area. Alternative D lacks the protection of Wild & Scenic Rivers - those riparian areas need to become stabilized and provide habitat for fish and wildlife. The degree protected is inadequate under Alternative D and left open to attractive industries.

I would urge you to choose Alternative C instead. Studies have shown 75% of the population prefers more protection of remaining wilderness not less. Creating only benefits a few owners & most of us are weary of subsidizing that industry.

Thank you for your attention to this critical matter.
Sincerely,

SARA A. NUNN
1026 Jackson St
Eugene, OR 97402

Comments to BLM
Resource Management Plan (RMP)

Alternative C- Resource Protection Emphasis with the following additions:

107-1

1. Withdrawal from mineral entry in the following areas: Tucker Hill, Red Knolls, Fort Rock, Cougar Mountain, Connelly Hills, Table Rock, Abert Rim, Paisley Caves, Five Mile Caves, High Lakes, Fossil Lake, Lost Forest, Riley Gravely, Klamath River Canyon, and Bryant Mountain areas.

Reason: Area of Critical Environmental Concern (ACEC) designation does not protect cultural sites from the Mining Law of 1872. Although some of these areas have low to moderate mineral potential, it is has been our experience (see Tucker Hill case) that it only takes minimal mineral potential for an area to be mined. This is due in large part to the strength of the Mining Law of 1872. Therefore, the only effective way of protecting our cultural resources within these areas is to have a withdrawal from mineral entry designation placed upon them in addition to the ACEC designation.

107-2

2. Protect Tucker Hill, Red Knolls, Fort Rock, Cougar Mountain, Connelly Hills, Table Rock, Abert Rim, Paisley Caves, Five Mile Caves, High Lakes, Fossil Lake, Lost Forest, Riley Gravely, Klamath River Canyon, and Bryant Mountain areas by restricting Off Highway Vehicles (OHV's) recreational use to roads only and with a permit. No further development such as construction or improvements of campground, boat launch or put-ins, in these areas as well. Would like to see discontinued use of recreational areas that are within 400 meters of cultural resource sites.

Reason: It has been our experience that recreational activities near or within our cultural resource sites have always proven to be detrimental to the resource. This is evidenced by the defacing of Rock Art throughout Lakeview and Klamath Falls BLM Districts, looting of cultural sites at Fort Rock, Connelly Hills, Table Rock, Paisley Caves, Five Mile Caves, Klamath River Canyon. OHV damage to Fort Rock Dunes area and Klamath River Canyon sites.

107-3

3. Protect Tucker Hill, Red Knolls, Fort Rock, Cougar Mountain, Connelly Hills, Table Rock, Abert Rim, Paisley Caves, Five Mile Caves, High Lakes, Fossil Lake, Lost Forest, Riley Gravely, Klamath River Canyon, and Bryant Mountain cultural sites from hazards of ground disturbing activities such as livestock grazing, mining, agriculture, and recreation.

107-1: Most of the ACEC's, RNA's and WSA's have low or, at best, moderate, potential for the occurrence of mineral resources. The likelihood of development of these minerals is very low. In addition, since the sale or lease of minerals is at the discretion of the local authorized officer, and a plan of operation is required for any locatable mineral activity within an ACEC, sufficient protection for these special areas is available for the majority of situations that might arise. As for WSA's, the interim management policy (USDI-BLM 1995b) prohibits any surface-disturbing activities that would require reclamation. The only area that is warranted for withdrawal from mineral entry is a portion of the Red Knoll ACEC, which has moderate potential for locatable minerals. Under the preferred Alternative D, the BLM would petition the Secretary of the Interior to withdraw approximately 4,600 acres. The final decision would be made by the Secretary.

See also the Stipulations for Mineral Operations section in Appendix N, and the descriptions for minerals management for each ACEC/RNA in the Special Management Areas section of Chapter 3.

107-2: Fort Rock is managed by Oregon State Parks. Klamath River Canyon and Bryant Mountain fall within the Klamath Falls Resource Area and are outside the planning area. Cougar Mountain and Fossil Lake are currently closed to vehicle access. These closures are carried forward into the preferred Alternative D. The south side of Cougar Mountain is private land. Vehicle use in the Lost Forest is currently limited to designated roads and trails, which is carried into the preferred Alternative D. The BLM proposes to designate the Table Rock area as limited to designated roads and trails. In the remainder of the areas you listed, we propose to limit vehicles to either existing or designated roads and trails.

BLM does not have a vehicle permit system; all-terrain vehicle permits are currently administered by Oregon State Parks and Recreation Department.

In the areas where the BLM proposes limiting camping to designated sites (Table Rock and Lost Forest), these would be primitive sites with no facilities. The locations of these designated sites would concentrate use away from more sensitive sites. At the remainder of the sites you listed, no developments currently exist and none are proposed.

107-3: All of these concerns for the areas mentioned above would be considered in the development of ACEC management plans, if needed. The Klamath River Canyon and Bryant Mountain are in the Klamath Resource Area and are not covered by this RMP. As a routine matter, grazing changes and any land-disturbing activity is taken to the Tribes for consultation.

Reason: It has been our experience that ground disturbing activities such as livestock grazing, mining, agriculture, and recreation near or within our cultural resource sites have always proven to be detrimental to the resource. In addition, grazing needs to be scrutinized more carefully and with more tribal consultation. Furthermore, it seems that Range personnel within the BLM have become dependent on the Categorical Exclusion (CX) designation when issuing or reissuing grazing permits. We firmly believe the BLM should be issuing or reissuing grazing permits only when an Environmental Assessment (EA) has been completed and the issues have been addressed to the satisfaction of The Klamath Tribes. See AIRFA, NHPA 1992, NAGPRA, ARPA, and NEPA.

107-4

4. No communications towers are to be placed on, in, or within twenty miles of the site boundaries of Tucker Hill, Red Knolls, Fort Rock, Cougar Mountain, Connely Hills, Table Rock, Abert Rim, Paisley Caves, Five Mile Caves, High Lakes, Fossil Lake, Lost Forest, Riley Gravelly, Klamath River Canyon, and Bryant Mountain areas. In addition, the BLM needs to thoroughly address the visual quality impacts caused by communications tower construction and maintenance.

Reason: It has been our experience that ground disturbing activities such as communications tower construction and maintenance near or within our cultural resource sites have always proven to be detrimental to the resource. In addition, when tribal members visit cultural sites they expect to see the natural landscape and viewshed and not communication tower structures.

107-5

5. Do away with BLM Policy that does not allow for the reburial of human remains when removed from BLM lands.

Reason: In keeping with our tribal beliefs The Klamath Tribes demand that all remains and funerary items be returned to their original resting place with added protective measures when appropriate. Furthermore, under NAGPRA museums and other federally funded agencies are forced to return The Klamath Tribes ancestral remains and funerary items. In several instances the areas where the items were collected/looted are from BLM lands.

107-6

6. If deemed by The Klamath Tribes that it is not possible to rebury ancestral remains in situ, the BLM agrees to set aside at least 15 acres in each of the following areas:

- Fort Rock
- Summer Lake
- Goose Lake

For a total of 45 acres.

107-4: At communication sites, and specifically at Table Rock, the preferred Alternative D states that all further work will be confined to the area of previous disturbance. Most of the other ACEC's would be placed in the right-of-way avoidance zone (Map L-8). Location of new towers in these areas would be discouraged, but would require further evaluation as part of the NEPA process. Such work would be coordinated with the Tribes in consultation. Those ACEC's that overlap WSA's would be placed into the right-of-way exclusion zone (Map L-8). New towers would not be allowed in these areas. Also see response to comment 107-3.

107-5: This was a policy decision made at the Washington Office and is outside the scope of this plan.

107-6: The BLM does not have the authority to set aside land for the exclusive use of the Klamath Tribes. This could only be accomplished through an act of Congress and the BLM cannot lobby for such an action. In the RMP, we have proposed to sell acreage to the Tribes for use as reinterment locations. This was proposed after consultation with the various Tribal groups. We have included a proposal for acreage in the Warner Valley area. Also see response to comment 107-5.

Reason: Under NAGPRA museums and other federally funded agencies are forced to return The Klamath Tribes ancestral remains and funerary items. In several instances the areas where the items were collected/looted are from BLM lands, private property, or property that has been developed, thus, making it difficult to place them back in situ with appropriate protective measures.

107-7

7. If human remains and/or cultural resource materials are inadvertently discovered on any BLM activity or under BLM permitting authority, all activities within one-hundred feet of the discovery will cease until such time as the Klamath Tribes can make a determination and recommend appropriate protection measures.

Reason: The Klamath Tribes have never relinquished their attachment to their human remains and/or cultural resource materials within the aboriginal homelands, nor was the property rights to our ancestral remains and/or cultural resources ever abrogated. Therefore, it is imperative that in order to ensure the protection of said sites and resources it is necessary to engage the **sole source expertise** and professional assistance of the Klamath Tribes.

107-8

8. No collection or excavation will occur without the consent of The Klamath Tribes.

Reason: Although federal laws exist to protect cultural resources they do not give the tribes any decision making authority as to the final disposition of the resources. Federal laws regarding cultural resource protection state the agencies must consult with the appropriate Indian tribes; however, it has been the tribes experience that this phrase has little to no authority when BLM interests and tribal interests conflict (see Tucker Hill case). In essence the agency can proceed with the project so long as the consultation process was followed. We believe this is not the way our cultural resources should be managed and expect the BLM to live up to its **fiduciary responsibilities** to the tribes.

Furthermore, The Klamath Tribes have never relinquished their attachment to their human remains and/or cultural resource materials within the aboriginal homelands, nor was the property rights to our ancestral remains and/or cultural resources ever abrogated. Therefore, it is imperative that in order to ensure the protection of said sites and resources it is necessary to engage the **sole source expertise** and professional assistance of the Klamath Tribes.

107-9

9. With The Klamath Tribes consent, if cultural resources and/or human remains must be collected, the disposition of the remains and/or cultural resources will be determined by The Klamath Tribes.

107-7: What is proposed has been the course of action for the finding of burials on the Lakeview District. The BLM is required to follow Federal law in regard to human remains.

107-8: While the right to conduct archaeological research is held by the BLM, consultation for approval for conducting excavations is always held by the affected Tribes. The BLM is required to follow Federal law in regard to the procurement of professional services, such as archaeological fieldwork. If possible and where practical, the expertise of the Tribes will be utilized. It is possible that the curation of collected artifacts could be administered by the Tribes.

107-9: The conditions set forth in the "Native American Graves Protection and Repatriation Act" are being followed and would continue to be followed under all alternatives considered. Also see response to 107-7 and Appendix B.

Reason: Although federal laws exist to protect cultural resources they do not give the tribes any decision making authority as to the final disposition of the resources. Federal laws regarding cultural resource protection state the agencies must consult with the appropriate Indian tribes; however, it has been the tribes experience that this phrase has little to no authority when BLM interests and tribal interests conflict (see Tucker Hill case). In essence the agency can proceed with the project so long as the consultation process was followed. We believe this is not the way our cultural resources should be managed and expect the BLM to live up to its fiduciary responsibilities to the tribes.

Furthermore, The Klamath Tribes have never relinquished their attachment to their human remains and/or cultural resource materials within the aboriginal homelands, nor was the property rights to our ancestral remains and/or cultural resources ever abrogated. Therefore, it is imperative that In order to ensure the protection of said sites and resources it is necessary to engage the sole source expertise and professional assistance of the Klamath Tribes.

107-10 |

10. Traditional Cultural Property (TCP) designation for the following areas:

- Fort Rock
- Cougar Mountain Area
- Connely Hills
- Tucker Hill
- Red Knolls
- Paisley Caves
- Five Mile Caves
- Table Rock
- Abert Rim
- High Lakes
- Fossil Lake
- Lost Forest
- Riley Gravelly
- Klamath River Canyon
- Bryant Mountain

107-10: Fort Rock is a state park and is not covered under this RMP. Klamath River Canyon and Bryant Mountain are located outside the planning area and are administered by the Klamath Resource Area. The designation of a traditional cultural property is not dependent upon designation of an ACEC and does not require an RMP to accomplish. The Connely Hills, Red Knoll, Table Rock, Abert Rim, High Lakes, and Rahilly-Gravelly are considered and presented in the RMP as traditional cultural properties, and fall under 36 CFR 800 regulations for management. Cougar Mountain, Paisley Five Mile Butte Caves (Paisley Caves and Five Mile Caves are the same), Fossil Lake, and Lost Forest are not considered by the BLM to have merit as traditional cultural properties, although they are significant resource areas. Tucker Hill was determined to meet the criteria for a traditional cultural property under earlier action related to mining.

11. The parties agree that there are extensive cultural and traditional sites and resources of the Klamath Tribes (comprised of the Klamath, Modoc, and Yahooskin Band of Snake Indians) located within and surrounding the aboriginal boundaries of The Klamath Tribes (see attached map of aboriginal boundaries).

107-11 |

12. Develop a Memorandum of Agreement with the Klamath Tribes.

107-11: A draft memorandum of understanding has been developed in consultation with the Klamath Tribes and is pending signature by the Tribe.

RECEIVED
JAN 7 9 2002
LAKEVIEW, B.L.M.

1-22-2002

To: Dwayne Sykes
From: John Griffin
Re: Lakeview Management Plan

I have perused the 3 volume Draft Plan for the Lakeview Resource Management Plan, and have the following comments.

Road Closures:

I'm against the further closure or restricted travel on any roads currently managed by the BLM. It is the wide open spaces that draw the few tourists Lake County attracts. If you close roads, you will funnel them into designated areas. Overcrowding will either a) drive them away, or b) actually cause damage in an overused area...prompting more closures and further crowding in the future.

Control of juniper:

This is commendable, if not about 10 decades too late. Get rid of the junipers, but don't restrict public access in doing so.

Shirk Ranch:

If you're going to preserve the house, improve the road that leads there.

Red Knoll:

It was revealed at the 1/14/02 meeting in Lakeview that the Red Knoll area would be closed to future mining. This is supposedly due to it's cultural significance to Native Americans. This would seem to be a consolation for allowing mining in the Tucker Hills. If it's truly significant, tell why. I've been to the Red Knoll area a few times, and have seen no unusual evidence of any significance, especially when compared to the Tucker Hills. A consolation prize to the tribes isn't a valid component of land management.

Adel Paiute Cemetery (Vol. 1, Section 3, p. 101):

You propose turning over 10 acres of the "Adel Paiute Cemetery" to the tribes. If your proposed 10 acres is about 1/2 mile west of Adel School, I must object. White pioneers are also buried there. I have studied the Warner Valley as a Lake County historian for years, and I believe I have developed credibility for my research. If we are talking about the land west of Adel School, a Clark was definitely buried there in 1899. Also, a Samuel Dodge, killed 12/24/1877 is probably buried there. The only Indian I've seen referred to as having been interred there was a girl who died in the 1920's-30's, mentioned in a Kittredge book. If the tribes know otherwise, I would love to see a list of interments. As far as I can see, it's a historic period graveyard with

108-1

108-1: Through consultation with the Tribes, traditional cultural values have been identified in the area. The area is important for the maintenance of traditions within the Tribes of the region. The ACEC is recommended to help deal with threats to the traditional cultural property that were present at Tucker Hill. Due to the laws regarding protection, the BLM is not at liberty to reveal exactly what values are present and where. Such information is considered sensitive and exempt from the "Freedom of Information Act."

108-2

108-2: This area was identified as a Paiute burial area by Nettie DeGarmo (deceased), who was in her 80s when she identified the area in 1976. Other informants for the area were Neva and Charlie Crump, Neva Crump's sister, and other local ranch families. No one ever mentioned the possibility of burials in the location other than Paiute. If you have documented evidence of such, the BLM would certainly take it into account. This action was not considered without consultation with local residents. The boundary of the existing fence was determined from the memory of the Crumps and others when rebuilt after destroyed by wildfire.

Native American and White pioneer burials. It would be inappropriate to turn it over to the tribes without further research, negotiations on access, etc.

What is really unsettling about this proposed land transfer is the total lack of communication between the BLM and other parties involved. Neighboring landowners were not contacted. No non-tribe members with historical knowledge (e.g. The Lake County Historical Society, etc.) were contacted.

It would seem that the tribes, with little or no written documentation, can command the BLM to accede to its whims. Your actions in regards to the Old Adel Cemetery, without contacting non-tribal parties, was quite insensitive and underhanded. I would suggest that a thorough study be made before consideration of handing over the cemetery to the Tribes.

Abert Rim and Picture Rock Pass:

The designation as a Native American traditional use area, or area of significant plant resources, should not in any way restrict access already limited to this area. In my 21 years in Lake County, and hundreds of trips to the "outback", I've never seen anyone harvesting camas, apos, etc. Twice I have seen wild plum pickers (Bullard Canyon and Warner Canyon), and I'm aware of one family picking elderberries. No one is harvesting Native American traditional food stuffs...none...it's not happening...including by Native Americans. In my 21 years of cruising back roads, I have never seen a Native American on a back road. Restrictions are simply not necessary.

If "significant" plant specimens exist, then let the Natural Heritage Foundation collect them. If the few travelers to the top of Abert Rim haven't hurt them in the past, there is no reason to assume they will in the next 20 years. Leave any roads open. In fact, improve them...present roads are really rough.

It was noted in the plan that the BLM may increase patrols into sensitive areas of Native American traditional use. Nobody objects. However, it's interesting that both Picture Rock Pass and the top of Abert Rim are shown on topographical maps as having "petroglyphs." You have an attractive nuisance situation. You advertise Native American sites, then want to close them down when people go there.

Spanish Lake Potential ACEC/RNA Vol.2, A-248:

The proposal of this area as an area of environmental concern due to the northernmost boundary of a desert scrub environment is perplexing to me. On the land masses of North and South America, every plant has a Northern boundary...also an Eastern, Western and Southern boundary. Under these criterion every plant known to exist would deserve at least one, and maybe four areas of environmental concern. I don't object if the BLM chooses to study this area, though it seems a questionable use of taxpayer's funds. However, make no rules or restrictions that might hinder the public's access to this area. As described, this particular plant community has existed since the Pleistocene Era. The area should thrive just fine for the next 20

The Paiute, like any other group, have the right to request land transfers/sale/exchanges with the BLM. However, the Tribes, being sovereign governments, do have certain options and rights prescribed by law and treaty, not reserved for other groups. The purpose of the proposal is to have a location where skeletal remains, which are frequently found in the region, can be relocated and buried. Federal policy does not permit such remains to be re-buried on Federal property.

108-3: At Tribal gatherings or powwows, native foods such as yampa and bitterroot are commonly consumed. We know through consultation and experience that Native Americans still collect these plants. One purpose of the ACEC proposals is to make additional areas available for plant gathering activity, a legitimate use of public lands. Within the Abert Rim area, most of the road closures shown on Map SMA-7 are proposed to comply with the wilderness IMP (USDI-BLM 1995b). The area would still be open by remaining open roads.

years without a new protective designation. I personally know of no people interested in harvesting, disturbing or destroying this shadescale-budsage community. If the era of open sheep grazing in the Coleman Valley did not hurt this habitat, then a few game hunters in the 21st Century won't hurt it.

Overall, no more restrictions. I would be happy to further explain any statements made in this communication.

Your Obedient Servant,

John Griffin,
Past President of the Lake County
Historical Society, Lakeview, OR.

929 Millview
Lakeview, Oregon 97630
(541) 947-4230

幸

Penelope Kaczmarek
LCSW

RECEIVED
JAN 28 2002
LAKEVIEW, BLM

Dear Mr. Sykes,

January 26, 2002

As regular 'tourists' in the Lakeview Resource Areas and a lifelong Oregon residents we have a keen interest in the BLM's intentions with regards to the pending management plan for those federal lands. Our families have long enjoyed quiet vacations in the Warner wetland areas, on the shores of Lake Abert and in the Hart Mountain National Antelope Refuge. We've been thankful for the times we've had not having to share wilderness with cattle or people disrupting habitats on ORVs. We've read 'Alternatives D and C' and are very much of the opinion that a strengthened Alternative C type plan which excludes livestock grazing and off-road vehicle use is called for.

We urge you to please take this once-in-twenty-years opportunity to update your wilderness recommendations for these precious areas -- we believe that protected lands wherein wilderness is allowed to thrive is often more important to preserve than is the need to exploit these lands for mining development, geothermal exploration, or for the 'thrill' or hunting opportunities they afford people riding ORVs.

So, if you'd be so kind as to register our comments when it comes time for deciding in favor of Alternative D or a strengthened C -- we're definitely for the latter and for objective standards and guidelines which help to preserve the Lakeview Resource Area.

Thanks much for your attention,

Penelope Kaczmarek, LCSW
Jack Kaczmarek, M.D.
Bette Ouderkirk
Mawr and Alexander Spiro

SeaTowae • 1600 N. Coast Hwy • Newport, OR 97365 • 574-5572

385 Oakview Drive
Roseburg, OR 97470
January 27, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

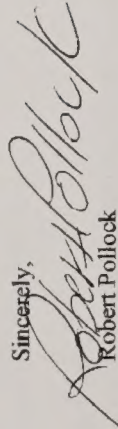
Dear Mr. Sykes:

With regard to the Lakeview Resource Management Plan, we urge you to reject Alternative D and implement Alternative C that has been strengthened by excluding livestock grazing and off-road vehicles from proposed wild and scenic rivers, critical fish and wildlife habitat, sage grouse leks, Areas of Critical Environmental Concern, Wilderness Study Areas, and grazing allotments in "fair" or "poor" condition. Furthermore, livestock operators should not be allowed to graze beyond the limits of their permits.

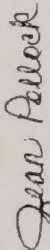
Alternative C would exclude livestock from all riparian areas thereby limiting stream degradation, but it needs to be strengthened to set reasonable caps on livestock grazing. Also, the area that would be entirely closed to ORVs needs to be increased. We encourage you to adopt an improved Alternative C in order to meet the resource management goals for a huge area of public land that has been abused and needs protection over the next 20 years.

Thank you for considering our comments.

Sincerely,



Robert Pollock



Jean Pollock

13617 S. E. Grant Ct.
Portland, Oregon 97233
January 28, 2002

Mr. Dwayne Sykes
BLM - Lakeview District Office
Lakeview, Oregon

Dear Mr. Sykes:

My comments on the Lakeview Resource Management Plan.

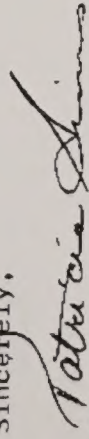
Alternative D, which I understand to be the BLM's preferred alternative provides inadequate protection for an area which is subject to severe abuse. Livestock grazing is a borderline use, at best, and needs to be more closely monitored than is possible even with maximum use of staff. This area which makes for poor grazing is much better suited to protection of rivers and wildlife habitat.

The use of off-road vehicles is hardly a necessity of life -- an enjoyable activity, yes, but the pleasure can hardly measure up to the destruction which these vehicles do to the land and which the pollution does to the air.

I recommend that the BLM adopt instead Alternative C with some strengthening, namely in the area of reducing or eliminating cattle grazing and definitely eliminating ORV use. Additionally the area should be completely closed to mining. The 1872 mining law should be taken off the books, but since it still exists it is necessary to protect every piece of our country from this antiquated law which allows for such heavy gouging of the American citizen.

Thank you for your consideration of my position.

Sincerely,



Patricia Sims
503-253-0590

Public Comment BLM Lakeview Resource Area Management Plan

Jon Tilles
1820 NW Juniper
Corvallis, OR 97330

RECEIVED
JAN 29 2002
LAKEVIEW, BLM

Please choose Option C in order to protect our national heritage from over-grazing and damage from ORVs. I have seen first hand in the Steens and Trout Creek mountains how excluding livestock from riparian areas allows recovery and restoration of these sensitive areas. A BLM fish biologist showed our group the impressive willow tree regeneration in a riparian area from which cattle had been excluded in the Trout Creek mountains. We also saw eroded, trampled banks where riparian grazing was allowed. Also, in the area where we camped, native vegetation was recovering due to a less intensive grazing regime.

The BLM must balance the needs of the land with those of the people who use it. Option C is the best choice.

Thank you.

1-28-02

Dwayne Sykes
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

Dear Dwayne

I am writing this response in regards to the
BLM's Lakeview District's Draft Resource
Management Plan/Environmental Impact Statement.

I will vote for and support Alternative A,
which is "No Change in Management"
Thank You

Best regards
Charles F. Stethem
18337 HWY 395
Lakeview, OR 97630

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, Oregon 97630

Jan. 28, 2002

RECEIVED

JAN 29 2002
LAKEVIEW, B.L.M.

Dear Mr. Sykes:

I am writing in support of Alternative B in the draft Lakeview Resource Management (RMP) plan with some modification.

I believe management that supports commodity production, particularly cattle grazing, also is good for wildlife. I find it particularly disturbing that under BLM management's preferred alternative there would be a moratorium in the development of new water resources.

114-1

The development of water resources allows the foraging of wild animals as well as cattle over a larger area and reduces the concentration of impacts on the range. Yet you will look in vain in the RMP for any mention of the beneficial impacts of cattle grazing.

114-2

BLM's preferred alternative seems to be designed to eventually get the cattle off the range. By leaving animal unit months (aums) at current levels outside areas of critical environmental concern (ACECs) and allocating more aums to wildlife; BLM seems to be guaranteeing increased impacts to existing allotments which will in turn be used to cut the number of aums allowed.

Alternative B offers the only means of increasing the carrying capacity of the land to provide for the aums allocated to wildlife.

The BLM seems to be provide two main reasons for new ACECs. The resource area contains some rare or endangered plants and there has been some damage to cultural or archeological resources.

114-3

The possibility of fencing off rare or endangered plants if they are threatened by livestock is not adequately discussed. If grazing really is threatening these plants; there is no discussion of how the BLM would keep wildlife grazing from threatening them. No information is provided on how widely dispersed these plants are in the areas the BLM wants to put in ACECs so it is impossible to make any cost benefit analysis between keeping the public off the land and the amount of protection afforded.

The problem of vandalism and theft is essentially a law enforcement problem. Yet the BLM wants to use these problems to keep the public off their lands by declaring sensitive areas ACECs.

This problem is better addressed by federal authorities making examples of offenders when they are caught.

Alternative B will keep the ranchers on the land so there will

114-1: In Alternative B, development of water sources and fencing is the preferred method for meeting resource objectives. In Alternative D, development of range improvement projects, which includes water developments, would be implemented to meet resource objectives only when other means of controlling or managing livestock grazing, such as change in season of use, change in grazing systems, etc., did not meet those objectives. Fences and water developments could be installed, but would be secondary to other means of grazing management. Only under Alternative E is there a restriction for development of any range improvement projects.

The only moratorium in the development of new water resources would be in intact playas and lakebeds. Playa lakebeds are very important to wildlife requiring succulent and protein-rich vegetation during critical periods of drought. This is especially true for greater sage-grouse and pronghorn antelope during periods of critical growth and development. Water developments within these naturally occurring lakebeds cause the water to be concentrated in a dug-out pit rather than spread over a larger area, thus reducing moist soil habitat available for forb development as the water recedes.

114-2: Refer to comment response 049-8.

114-3: None of the ACEC's are being proposed solely for the protection of BLM-sensitive plant species. While it is true that the presence of a sensitive plant species may meet the relevance or importance criteria, in all cases other relevant or important values are present that are also driving the ACEC designation. These values are listed in Table 2-33.

There is no proposed ACEC in Alternative D which proposes fencing around Bureau-sensitive plants at this time. After monitoring and evaluating for several years, fences could be built, if needed, to protect these sensitive plants and/or plant community cells (for which the ACEC is designated).

Also see responses to comments 197-2.

be more people with a vested interest in protecting threatened or rare resources.

The road restrictions in the proposed ACECs are too high a price to pay for protections afforded. Just because a resource is valuable or rare doesn't mean it should be placed off-limits to the public. Such a policy likely violates the Americans with Disability Act which says the government is to provide equal access to all citizens.

Efforts such as educating local high school students and the citizenry at large as to the value of rare or endangered resources has not been adequately considered.

There I cannot support adding any ACECs including the one proposed in Alternative B.

The BLM seems to be following Clinton-era instructions to reduce the number of roads available to the public. Road construction would be permitted if they caused zero impact or improved riparian areas. Such roads don't exist, particularly in the construction process. Therefore, this language is used just to mask BLM bias against public access.

I am against any further designations of Wilderness Study Areas or wild and scenic river designations because these items are used to move resource users and recreationists off their land. These studies are never completed in a timely manner and enough area has been put into wilderness already to provide for the small amount of the population that has time to enjoy it.

I never considered supporting Alternative A because it is declared by management as inadequate in the purpose and need statement. Also, under this alternative, resources would be managed on a case-by-case basis which is against national direction for resources to be managed on an ecosystem basis.

This same case-by-case resource management is also inserted into Alternative B. Since there is no reason the land cannot be managed for commodity production with a view to ecosystem health; I find the decision to manage on a species by species basis in alternative B to be arbitrary and capricious.

This RMP is full of statements like this one found in the noxious weed segment that commodity production "could enhance introduction and spread of weeds." Unless such a statement is scientifically supported and quantified, it amounts to nothing more than a statement of prejudice and should be left out.

In conclusion, BLM states under each alternative that standards and guidelines would be met. Therefore, it already has enough authority to protect resources without placing them off-limits to the public.

114-4: Closing roads to vehicle access does not circumvent or violate the "Americans with Disabilities Act."

114-5: Due to the fact that there are an estimated 5,000 miles of existing roads and trails within the planning area, the BLM expects that few new roads would be constructed. Any new road construction would follow the BMP's outlined in Appendix D. Even though some existing roads would be closed, public access throughout the resource area would remain adequate. Refer also to comment response 19-4. If additional routes are needed for public access or other purposes, they would be considered on a case-by-case basis.

114-6: As stated in Chapter 4, in the discussion of the impacts of Alternative B, commodity production could enhance the introduction and spread of weeds.

The public is best served by keeping the caretakers of the land, the ranchers, out there actively managing our resources. Therefore I support Alternative B.

Sincerely,

Jerry Jones
Mitzi Jones

Jerry and Mitzi Jones
944 1/2 Eldorado
Klamath Falls, Oregon 97601

Institute for Wildlife Protection

541/689-1460 VOICE
541/688-6050 FAX

January 25, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

115-1

Enclosed please find comments by the scientific staff of the Institute regarding the proposed management for BLM lands identified in the Lakeview Resource Management Plan (RMP). In brief, we are distressed at the proposed management direction, particularly the lack of restrictions on off road vehicles and livestock grazing. The preferred alternative will quickly lead to extirpation of sage grouse throughout the area. Even alternative C, the least damaging alternative, will not adequately protect sage grouse and other wildlife, as well as human esthetic and recreational interests. Another concern is the reliance on adaptive management to the exclusion of any monitoring or objective standards. Adaptive management can be useful, but only when clear, objectively verifiable standards exist, and when monitoring is adequate to determine if those standards are being met. The RMP is woefully deficient in this area.

Please route all your contacts through our Eugene, Oregon office. Please contact me (at the address or telephone number above) if you need any assistance. The citations in the text are included as a computer file on the enclosed disk.

Sincerely,

Don Webb

Don Webb

Office of Species Protection - Eugene, Oregon
Office of Ecosystem Protection - Laurel Hill, Oregon
Office of International Affairs - Olympia, Washington

Office of Species Protection
2630 Ellnor St.
Eugene, OR 97403

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JAN 29 2002
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115-1: The BLM published management guidelines for the greater sage-grouse and sagebrush-steppe ecosystems in August 2000 (Sage Grouse Planning Team 2000). These are intended to be interim guidelines until a long-term strategy can be assembled. Many of the standards in the management guidelines are also included in the RMP. The BLM disagrees that implementation of Alternative D would quickly lead to the extirpation of greater sage-grouse. As new information becomes available, the BLM would reevaluate the management direction and make changes where necessary, in accordance with adaptive management principles. A monitoring plan for greater sage-grouse is included in Appendix R.

L-115

From: DaMoenk@aol.com
 Date: Thu, 24 Jan 2002 12:11:35 -0800 (PST)
 Subject: Adopt a New & Improved Alternative C

Mr. Dwayne Sykes
 BLM - Lakeview District Office
 HC 10, Box 337
 Lakeview, OR 97630

Dear Mr. Sykes:

Thank you for the opportunity to offer comments on the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Please consider these comments as the Lakeview BLM District Office prepares its final RMP/EIS for the Lakeview Resource Area.

It is my understanding that the BLM has chosen Alternative D as its preferred alternative. Unfortunately, this option fails to satisfy the Lakeview RMP's stated intent to adhere to ecosystem management principles. Further, Alternative D does not reduce livestock grazing levels by a single Animal Unit Month (despite the RMP's acknowledgement that cattle grazing causes resource damage), and it leaves the overwhelming majority of the planning area open to destructive off-road vehicles.

I urge you to reject Alternative D, and choose instead a strengthened and improved Alternative C. Alternative C comes much closer to meeting the Lakeview RMP's goals and objectives by excluding livestock from all riparian areas, designating zero acres as "open" to cross-country off-road vehicle use, recommending all 22.8 eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern and designating twelve new ACECs, and limiting energy and mineral extraction throughout the planning area.

Alternative C is heads and shoulders above the BLM's preferred alternative, but it still needs improvement. To offer true resource protection, and to safeguard these 3.2 million acres of public lands, the BLM should choose a strengthened Alternative C that excludes livestock grazing and off-road vehicle use from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, all ACECs and Wilderness Study Areas, and grazing allotments that are not meeting management objectives.

In addition, this RMP must include objective standards and guidelines so that its success over the next two decades can be adequately gauged. Reliance on "adaptive management" may only lead to further resource damage, as BLM lacks the staff and funding to perform the constant monitoring that adaptive management requires.

Finally, I urge you to take this once-in-twenty-years opportunity to update the BLM's wilderness recommendations for the Lakeview Resource Area (LRA). Five of the 14 Wilderness Study Areas found within the LRA were recommended by the BLM as non-

Note: Letters 116 through 181 were sent in the same envelope and are essentially verbatim. Letter 181 is reprinted here to represent the content of those letters.

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LAKEVIEW, B.L.M.

suitable for wilderness in 1989. In each of these five cases, the rationale provided in the Oregon Wilderness Final EIS for a non-suitable recommendation was based on potential or planned projects - such as geothermal exploration, mineral development, intensive range projects, and powerline construction - that may or may not remain viable, or desirable, 15 years after the original wilderness inventory was conducted. The Lakeview RMP process is the most appropriate venue for reviewing and updating this information in an effort to determine if the BLM's current wilderness recommendations are still valid.

Thank you very much for your time and consideration of my comments and concerns.

David Moenkhaus
2837 N. Talman
Chicago, IL 60618

26.01.82

Lake View BLM

In regard to the Lakeview
Resource Area Management Plan, I
would encourage you to choose
Alternative 1. I am particularly
concerned about discouraging
off road vehicle use as well as
encouraging regeneration of riparian
areas through decreasing grazing.

Thank you,

John Berger

24417 Lignite Ave

Corvallis, OR 97333

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JAN 30 2002

LAKEVIEW, B.L.M.

January 24, 2002
4349 Midway Avenue
Grants Pass, Oregon 97527

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

To Mr. Dwayne Sykes:

I am an Oregonian, a wildlife, nature and landscape photographer who loves all of nature in it's wildest beauty and natural form.

Some of these wild lands include Lost Forest, Guano Creek, Warner Wetlands, and Abert Lake; which to my understanding are in the Lakeview Resource Management Plan that will guide the management of 3.2 million acres of federal lands in south central Oregon over the next 20 years.

Within this region lies some of Oregon's wildest roadless lands and streams that provide vital habitat for sage grouse, Warner suckers, California bighorn sheep and pronghorn and redband trout.

It is with deep love for the land and it's wild creatures that I recommend that the Lakeview Resource Management Team take a bold step forward and really get serious about protecting Oregon's magnificent desert wildlands; by not allowing grazing and the usage of ORV's to tear and wear away at the natural lands.

I urge you to reject Alternative D and choose a strengthened Alternative C that would exclude all livestock grazing and off road vehicles from:

- Critical fish and wildlife habitat
- Sage grouse leks (mating areas)
- Areas of Critical Environmental Concern (Sand Dunes and Lost Forest area)
- Wildlife Study Areas
- Please recommend Wild and Scenic Status for 22.8 miles of three streams (Twelvemile, Guano and Honey Creeks):
- Close 500 miles of roads in Special management areas (e.g., WSAs and ACECs) and all roads in riparian areas.
- Add 1,194 acres to existing Wilderness Study Areas.
- Add 18,000 acres to four existing ACECs and designate 12 new ACECs encompassing 129,000 acres.
- Close a high percentage of the area to energy and mineral extraction

Alternative C needs improvement because it fails to set reasonable caps on livestock grazing and allows limited use of ORVs on more than THREE MILLION ACRES of the planning area. That needs to be corrected!

If the BLM intends to protect these 3.2 million acres for future generations it must choose a strengthened Alternative C.

Please, for the sake of wild lands and creatures take a strong stand now and pass a strengthened and improved Alternative C which would come much closer to meeting the Lakeview RMP's goals.

Your work is daunting I know, but please help keep this beautiful high desert area wild for all the generations to come, so they may enjoy and take strength from it as we do today.

Thank you for all the hard work you do for the wild earth and it's wild creatures of beauty.

Patricia Garoutte

Patricia Garoutte
4349 Midway Avenue
Grants Pass, Oregon 97527
e-mail: debnpat@internetads.com

cc: ONDA
ONRC
SW
PG

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LAKEVIEW, B.L.M.

January 28, 2002

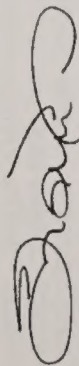
Dwayne Sykes
RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview, OR 97630

Dear Dwayne:

I am still reading the Lakeview Draft Resource Management Plan and Environmental Impact Statement. This is a lengthy document with many areas of controversial design.

I request the comment period be extended and another local public meeting scheduled.

Sincerely,



Larry A. Utley

LAU: dd

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JAN 30 2007
LAKEVIEW, B.L.M.

TO: Lakeview BLM

1/28/02

FROM: Erik Fisher
2660 Fairmount Blvd
Eugene, Oregon 97403

RE: Lakeview RMP

Dear Sirs:

I understand that you are receiving submissions regarding the Lakeview RMP. I am glad to have an opportunity to comment. The management for your RMP should make some significant improvements over the present. There appears to be a trend towards increasing degradation of the quality of the natural resource on your BLM lands -- a problem not restricted to your district. Your new RMP represents the chance of a generation to make some needed changes.

-1- Grazing is a resource degrading use. This does not mean that it is a not a valid use, but it does mean that it has deleterious impacts on grass/shrub and riparian ecosystems -- something that has been endlessly documented (eg. Dwire et al, 1999, "Ecological Influences of the Introduction of Livestock on Pacific Northwest Ecosystems", In *Northwest Lands, Northwest Peoples*). The only clearly successful management changes have involved reducing or eliminating riparian grazing (cows have been called, correctly, primarily a riparian, not a grassland, species in the arid Northwest); and reducing or eliminating grazing in other sensitive areas, especially ones that remain in better condition -- eg, do not have significant invasions of exotics, or have sage grouse & other indicators of ecosystem health. Non-ecological factors -- politics and local economics -- have been the main influences that have driven persistently high levels of grazing in the face of ecosystem decline. That many numbers of cattle have decreased from generations ago can often be explained as less a reflection of sounder practice per se than an indication of resource decline and reduced carrying capacity from pristine sage steppe.

These are the facts. What do they mean? That a responsible RMP covering another 20 years of management cannot exclude reduction of grazing as a management tool for some areas and elimination of it in others, especially riparian zones. The preferred Alternative D does not appear to have made sufficient provision for such necessary management.

-2- ORV use is another resource degrading activity. It is not just another form of fun: it is a multiplier of adverse human impact, amplified because that's what technology does, empower people to do more -- in the case of ORV's to the detriment of the land. ORV's compact or loosen soil, rut the land, trample vegetation, scare wildlife -- leaving impacts that persist. Worse, off-road ORV use quickly encourages itself, and a single wanderer, forging a new path across the trackless land, leads others to follow suit. voila, a new "trail" is created, simply by the passage of several machines. Hiking and horses simply do not impact the land in the same way or to the same degree. These are indisputable facts -- ones that honest ORV users agree with.

ORV use is not as bad in your district, overall, as in other BLM areas (like in the Owyhee Mountains over in Idaho). However, that is a qualified statement -- the qualifier is "yet". There is no "right" for people to drive wherever they please. There should NOT be any areas open to cross-country ORV travel -- except for permitted ranching use. This does not say there should be no ORV use -- many ORV advocates are often notably paranoid that management equals prohibition. It does

185-1

185-1: In the planning area, approximately 396,269 acres of public land are currently set apart from grazing allotments specifically to improve or protect resource values (240,535 acres excluded) or were determined unsuitable for livestock grazing (155,734 acres unallotted) (refer to Table 2-28). About 472,890 of additional acres within grazing allotments have limited use, based on prior agreements or decisions protecting multiple resource values including, but not limited to, water developments, riparian communities, streams, and wetlands. There are 85 miles of streams in the planning area, 49 of which are excluded from livestock grazing (Table 2-22). An additional 28 miles have active livestock grazing management in place. Table 2-28a contains a summary of the assessments for rangeland health and grazing management guidelines completed to date in the planning area. The assessments completed represent 49 percent, or 1,469,959 acres, of the planning area. The assessment process will continue through 2008, at which time the entire planning area will be completed. Through this process, if problems are identified that are attributable to livestock grazing, management changes will be identified. These may include livestock reductions, exclusions, or modification of grazing management systems to make process toward attainment of the unmet standard(s). The changes would be implemented the following grazing season as required by 43 CFR 4180.

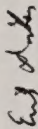
say that ORVs should be on designated trails. Obviously, such needs to be enforced.

Once again, Alternative D is simply inadequate in its proposals regarding ORV management: damage should be prevented -- and it is so preventable, with management that closes trackless land to tracking motorized recreation.

It goes without saying that even if some carefully selected areas do remain open off-trail, that ACEC's and WSA's should be closed to ORVs. I would be interested to hear a defense of why or how ORVs enhance the environment in an ACEC or are compatible with wilderness characteristics in any WSA.

These considerations clearly rule out Alternative D. Sadly, they are not included in Alternative C, otherwise the closest that you seem to have considered to an alternative that is serious about promoting ecological health and integrity. That seems to indicate that an Alternative C that includes grazing limits and reductions in its management and routes ORVs onto routes and roads by closing cross-country use (except, as I say, for bona fide ranching use) is the actual best option. Please consider including such in your final version.

Sincerely yours,



Erik Fisher

185-2

185-2: OHV use within all of the proposed ACEC's, with the exception of the Rahilly-Gravelly ACEC, which would be limited to existing roads and trails, would be limited to designated roads and trails. OHV use within four existing ACEC's would be restricted as follows: Devils Garden and Warner Wetlands would be limited to designated roads and trails; most of Lake Abert ACEC would be limited to existing roads and trails; the portion that overlaps the Abert Rim WSA would be limited to designated roads and trails; and in the Lost Forest/Sand Dunes/Fossil Lake ACEC, there would be a mix of OHV designations, including closed areas, limited to designated roads (or ways) and trails, and open (refer to Table 3-5). The large sand dunes within the ACEC and Sand Dunes WSA would be open to OHV's. However, an additional 2,328 acres would be included in the Fossil Lake Vehicle Closure Area, thereby reducing the total acreage of the dunes currently designated open by the same amount (Table 3-3).

The "Interim Management Policy for Lands Under Wilderness Review" (USDI-BLM 1995b) allows for the open designation in a WSA under two circumstances: (1) as sand dune or snow areas for use by the appropriate sand or snow vehicles, or (2) where an area was designated open prior to October 21, 1976. The area of large dunes within the Sand Dunes WSA meets these criteria. An area of smaller dunes located on the north side of the main access road 6155-0-00 would be limited to designated roads and trails (Maps R-7 and SMA-9a). This area is outside of the WSA, but is still part of the ACEC complex.

OHV use within the Devils Garden, Fish Creek, Hawk Mountain, Guano Creek, Sage Hen Hills, and Abert Rim WSA's would be limited to designated ways and trails. The remainder of the WSA's within the LRA would be limited to existing ways and trails.

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ASSOCIATION

January 28, 2002

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EXECUTIVE DIRECTOR
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Bend, Oregon

Scott Florence, Area Manager
Bureau of Land Management
1301 South G St.
Lakeview, OR 97630

Dear Scott,

Thank you for the opportunity to review and comment on the DRAFT management plan for the Lakeview Resource Area. Based upon review of the DRAFT, we strongly support **Alternative C** as the most responsible and achievable balance between resource protection and resource use. Other alternatives seem to provide unacceptable levels of protection for existing resources, or promote actions that would inhibit resource recovery or reduce alternatives to effective management.

For the past 30 years, the BLM has participated in the Interagency Natural Areas Committee. The BLM has been a leader in designating new ACEC/RNAs throughout the semi-arid parts of the Pacific Northwest. The Lakeview District and Resource Area has either already designated or proposed for designation in this plan, a large number of areas that best represent high quality examples of relatively unaltered vegetation and wildlife communities. These are the "elements" or "cells" listed in the Oregon Natural Heritage Plan.

It is essential that the Lakeview District proceed with designation of all RNAs proposed in this plan. They truly are the "best of the last" examples of these communities. Moreover, the other participating federal, state, and private agencies/groups rely on the BLM to play a leadership role in designation and management of these areas as no comparable examples occur on other federal, state or private lands. The other partners in the Interagency Natural Area Committee take the lead in designation and ownership in lands that they own and/or manage. This type of cooperation assures the public that duplication is greatly reduced and that the onus and responsibility for managing RNAs is shared by all participants.

The following comments pertain to designation of Research Natural Areas (RNAs) and Areas of Critical Environmental Concern (ACECs). I offer my comments based on 25 years of working in the identification, design, and on-the-ground management of natural areas, and as Executive Director of the Natural Areas Association, a national organization of natural area managers, scientists, and

P.O. Box 1504 • Bend, Oregon 97709
Phone: (541)317-0199 • Fax: (541)317-0140 • Email: naa@natareas.org

and volunteers. I also am a current member of the Oregon Natural Heritage Advisory Council. In the past, I served on the federal Resource Advisory Committee for Southeast Oregon.

General Comments:

186-1

1. Wildlife and wildlife habitat restoration in alternative C specifies "areas of moderate to low ecological condition" as targets for restoration. It would be a big mistake to attempt ecological restoration in low condition sites. It would be very costly and may not be possible in many instances. Restrict restoration efforts to moderate to good condition sites.

186-2

2. ACEC/RNA values may be sacrificed by mineral exploration or mining. They should all be withdrawn from mineral entry to assure the integrity of the areas.

Site Specific Comments:

Lost Forest ACEC/RNA

186-3

Having visited this area on numerous occasions, I've been discouraged to see the extent of recreational vehicle activity in the area. The RNA proper needs to exclude recreation. This can be done by closing access roads (except for management purposes) at a sufficient distance from the RNA boundary (e.g., at least two miles). Additionally, camp grounds in or around the RNA need to be closed, both on the ground and on any official documentation such as brochures, information pieces, maps, and the like.

After initial management closures to protect the RNA resources, a credible monitoring program needs to be put on-the-ground which will assess the effectiveness of the management action, and take additional actions, as needed.

186-4

Due to the extent of bare soil within the RNA, it is vulnerable to invasion by weeds and other exotic species, some of which could drastically alter the composition, structure and function of the Lost Forest ecosystem. The fact that this has not occurred in any significant degree to the point, is not evidence that the area is not susceptible to weedy, invasive species. Effort needs to focus on monitoring for weed invasion at key access points (even if they are closed in the future) as well as at existing weed population locales. Vehicles, livestock, wildlife and people are primary vectors for the dissemination for weeds. The more activities that promote or facilitate the establishment of weeds are curtailed, the lower the long-term management costs will be, and the more likely that the management objectives that have been established for the area will be realized.

186-1: The BLM agrees it would be costly and may not even be possible to restore some habitats that are in low ecological condition. However, if an area is in good ecological condition, it probably does not need restoration. Restoration efforts would concentrate on those areas in moderate ecological condition where positive progress is most likely. These tend to be areas where some native species are still present, and there is a good chance of a positive response to the restoration efforts.

186-2: Please see response to comment 107-1.

186-3: Refer to comment response 98-1. SMA's such as ACEC's, RNA's, etc., are managed to protect the relevant resources within the established boundaries—buffer zones around SMA's are not appropriate. Official documentation such as brochures, maps, etc., are valuable tools which should be used in education, interpretation, and enforcement.

186-4: As stated in Chapter 3 under the Noxious Weeds, Alternative A, Current Management section, "Emphasis is on detection of new invaders and inventory and control in proven hotspots such as roads, rights-of-way, waterholes, and recreation sites." This would include the Lost Forest RNA because it is an RNA and a high use recreation area. This same management would apply to Alternative D, the preferred alternative.

Connely Hills RNA

Until it can be demonstrated that grazing with domestic livestock is beneficial to the natural values (e.g., vegetation and soils) for which the area was designated, I recommend that the area be closed to grazing either by discontinuing the range permit, or by fencing the RNA in its entirety. One of the long term values of RNAs is that they offer areas to compare against comparable ecosystems that are more intensively managed for production. Base line or reference areas are increasingly difficult to find, and they provide one of the only means to assist the manager in assessing mid- and long-term change within their resource areas. Although stated here under the Connely Hills RNA, my comments regarding the importance of reference areas and the real and potential damage that can occur with livestock grazing, extend to *all* of the existing and proposed RNAs within this resource plan. I will not repeat them in each instance for the sake of brevity.

186-5

High Lakes ACEC, Sink Lakes/Guano Creek ACEC/RNAs

I recommend expanding the northern boundary of Sink Lake and Guano Creek RNA so they connect with Hart Mtn. National Antelope Refuge across the T38S, Range 26 & 27E. They contain the same resource values and a great deal can be made for adding this type of connectivity between the two areas and Hart Mtn. Refuge. This would also greatly reduce future resource conflicts and monitoring needs in this remote area.

186-6

Hawksie-Walksie RNA

Close the north-south road which extends from Sage Hen Hills WSA roughly along the township boundary of T 40S and T41S, R30E and R31E. Fence off key grassland areas within the RNA, especially the "isolated" parcel which straddles the T41S, R29E,R30E boundary.

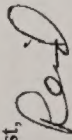
186-7

Black Hills RNA

Fence the southern and southeastern boundary to keep domestic livestock out of the area.

Thank you again for the opportunity to comment. If I can be of additional assistance, please let me know.

Best,



Reid Schuller

186-5: RNA/ACEC's may be managed for a variety of relevant and important values within the same unit. In several RNA's, topography, lack of water sources, and other factors preclude livestock from using the area to any significant degree. Fencing, livestock reductions, changes in seasons of use, and/or other livestock management actions would be implemented if livestock grazing is determined to have an adverse impact on the relevant and important values.

Most of the grazing in the proposed Connely Hills ACEC/RNA is concentrated in the southern portion. That area is used every other year and will be monitored to evaluate the effects of livestock and wildlife grazing on the resources. During the past few years, the elk herd has increased and at times during the year can number 150 to 200; also, this area is part of the deer winter range and seasonally has high numbers of deer in the area. The BLM will work with ODFW so that those effects will be monitored. Monitoring for effects of livestock and wildlife grazing will be applied to all proposed and existing RNA's where grazing is allowed. Refer to the Special Management Areas section of Chapter 4.

Also see response to comment 197-1.

186-6: Please see response to comment 98-2.

186-7: The north-south road through Hawksie-Walksie Valley will remain open; however, the road south into the Sheldon Refuge will be closed. Because of the potential for wild horse pressures and livestock grazing, the grass cell areas are being monitored and evaluated with respect to grazing management and any changes that may be needed in the future. See response to comment 90-1 and the Special Management Areas section of Chapter 4. The Black Hills will be monitored in relation to grazing (see Appendix R). Also see response to comment 197-1.

Mr. Dwayne Sykes
BLM - Lakeview District Office
HC 10, Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes:

I am writing to comment on the proposed Lakeview Resource Management Plan.

1) The plan makes use of the Adaptive Management concept. It is implicit in this that there is a desired outcome or destination, comparison of actual progress with that desired (monitoring) and revision (adaptation) as indicated by the monitoring activity. This is an excellent management tool, but only if there are clear and appropriate goals and guidelines, effective monitoring, and adaptation that does not undermine the goals. All elements - goals, monitoring, and adaptation - must be present.

2) Your agency's preferred alternative sets too low a standard for the "protection of natural values" objective and does not adequately address the monitoring requirement.

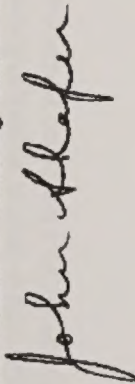
3) Alternative C, by prohibiting grazing in riparian areas and limiting ORV use, along with other desirable provisions, establishes conditions which will protect natural values much better than Alternative D. Further improvement can be made, however.

4) I support responsible grazing on public lands, and believe that its continuation will help stabilize land use patterns on private land with resultant benefit to wildlife and other natural values. "Responsible grazing", as I view it, entails prohibition of grazing in sensitive ecological areas, WSAs, and ACECs, and maintains grazing intensity at low enough levels to avoid degradation of the range. Jerry Holeczek and others have established reasonable guidelines for range utilization which does not damage the resource or natural values. If you are serious about protecting natural values, these guidelines will have to be adopted and rigorously monitored and enforced.

Off road vehicles are another matter entirely. By their very nature they are in conflict with protection of natural values. I can think of little that is more unnatural than ORVs running at will through these areas, except perhaps F-15s on low level training flights. In my experience, ORV enthusiasts clamor endlessly for the right to meet their "need" to blast mindlessly through the range without regard for their impact on the land, on livestock, and on other recreationists. Something that didn't even exist 25 years ago can hardly be held to be a basic human need. If these people wish to enjoy the wild areas of the region they can hike, ride horses, or drive existing roads. These noisy, destructive machines should not be permitted on public lands.

Protection of natural values should be the highest priority in your stewardship of the public land. Grazing, if properly managed, is compatible with this goal. Alternative C, enhanced by protections for range health, and sensitive natural areas as mentioned, and by prohibition of ORVs, comes closest to balancing natural and commodity production values.

Sincerely, John Shafer



187-1: An expanded and detailed monitoring plan for all resources is included in the Proposed RMP/Final EIS (Appendix R) and will be part of the approved RMP/ROD when it is completed.

187-2: The BLM grazing program uses rangeland assessments (USDI-BLM 1997a), monitoring, and enforcement to promote responsible grazing on public lands. The program manages grazing to either maintain or improve ecological conditions, depending on the allotment-specific multiple use objectives.

Livestock grazing in WSA's is a grandfathered use. When managed properly, grazing does not impair wilderness values. Livestock grazing in ACEC's would depend on the values and the relevance criteria for which the ACEC's were designated. Livestock grazing would not automatically be prohibited and when managed properly, is compatible with the management direction of the ACEC's.

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, Or. 97630
January 30, 2002

Dear Mr. Sykes:

I am very concerned about the BLM's preferred alternative D in the Lakeview Resource Management Plan. This alternative fails to adhere to sound ecosystem management principles.

Alternative D would continue livestock grazing in areas identified as in poor and fair condition and in critical riparian habitat areas. It would also allow additional damage from off-road vehicles- contrary to the stated intent of the Lakeview RMP.

I support Alternative C in addition to several improvements. Alternative C should be strengthened by setting reasonable caps on livestock grazing and by closing additional areas to off road vehicle use.

Any plan adopted should exclude livestock grazing and off-road vehicles from: proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, ACECs, WSAs and any grazing allotments in poor or fair condition.

The BLM must join the strong majority of Americans who demand that their public lands be managed to meet the needs of wildlife for this and future generations. To date, the BLM has failed to address this demand. You have a great opportunity to do so in adopting Alternative C with the changes I have suggested above.

Thank you,

Candice Guth
1816 SE 34th Ave.
Portland, Oregon 97214
503-235-0617

To Whom It May Concern:

RECEIVED
JAN 30 2002
LAKEVIEW, B.L.M.

In regard to Beatty Butte Grazing Association and allotment within the B.L.M. management plan.

I can see no reason for setting aside any land for an area of critical concern, as all of the land is under B.L.M. jurisdiction. Within this area all the lands proposed for A.C.E.C. are also within the Wilderness Study Area which does not allow road building or any land disturbance of any kind. So I can't see any benefit for A.C.E.C. as it is already locked up.

As far as road closer in this area most all roads within the W.S.A. are closed. I can see a negative benefit from this closer in the fact that this is a huge area with very little recreation and with roads closed, no one wishing to see the country could do so.

If the recreation in the future should cause problems, then would be the time for B.L.M. to address it. As of now people should be allowed to enjoy this public land the way it is.

I am not in favor of any new roads but keep the ones that have been in existence for the last 100 years and not close them. There is now only one main road that is maintained by the B.L.M. The rest are as they have been for years and are good enough for recreation, hunting etc. The roads also are being used for horse trailers to haul horses for the management of livestock as the area is so large it would be impossible to reach all of it on horseback without the help of more camps and this is not allowed as it is W.S.A. Without these roads it would be impossible to manage the livestock.

In regard to what you call Paiute Adel Cemetery, I believe there is also some white Adel pioneer people buried there. I also believe that 10 acres is too much. One acre would be plenty as the B.L.M. is not repairing the existing fences anyway.

John Lane
Pais, B.B. & A.
member - B.B. & A.
John M. Lane

189-1: ACEC's are designated where special management is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect humans from natural hazards (43 CFR 1610). In an area of 3.2 million acres, more management attention is needed. RNA's are areas where natural processes predominate and are preserved for research and education. Under current BLM policy, these areas must meet the relevance and importance criteria of ACEC's and are also designated as ACEC's. RNA's serve as an outdoor laboratory and as a baseline to compare the effect of human manipulations in similar settings. An ACEC does not necessarily prevent activities such as grazing, OHV use, mining, road building, or land disturbances, but it does focus management attention on that area. In order for an area to become an ACEC, there are strict criteria and a process. Designation is based on relevance and importance criteria, not only locally, but on a larger scale.

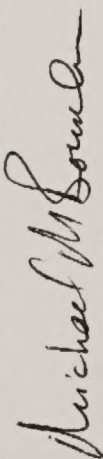
189-2: Existing roads and ways which were documented in maps published in the "Oregon Wilderness Final EIS" (USDI-BLM 1989a) within WSA's would generally be open for use. An estimated 5,000 miles of vehicle routes exist within the planning area. The number of miles currently closed and proposed to be closed make up a small percentage of the these existing routes (Table 4-4).

189-3: The cemetery area and list of internees were developed in consultation with local people in Adel, such as Neva and Charlie Crump, Velma Newcombe, and Nettie DeGarmo of the Northern Paiute. If you have specific information on non-Indian burials in the location, we would like to hear from you. Ten acres is the smallest size parcel which is reasonable for a land sale action of this kind. Since we do not know exactly where burials are located, it also errs on the side of caution. Transfer of the property out of Federal control would allow for better maintenance of the fences and area. If it can be determined that non-Indian people area buried in the location, a "Recreation and Public Purpose Act" lease or patent transferring ownership to a public group (including the Paiute) may be possible. Refer also to comment response 108-2.

FEB - 1 2002

LAKEVIEW, B.L.M.
Comments on the Draft Lakeview Resource Management Plan/Environmental Impact Statement.

Michael M. Borman
 Rangeland Resources Extension Specialist
 202 Strand Hall
 Dept. of Rangeland Resources
 Oregon State University
 Corvallis, OR 97331



190-1

January 30, 2002

My comments are confined primarily to the grazing system discussions and to biological soil crust impacts discussed in Chapter 4.

Rest-rotation grazing

My concern is with the emphasis on rest-rotation grazing. The description of rest-rotation grazing in Table 4-1 (Pages 4-4 and 4-5) suggests that it is the superior system for the Lakeview District. Rest-rotation grazing can work to accomplish the benefits ascribed to it in Table 4-1, but you should not expect it to work everywhere, under all conditions. All grazing systems (or prescriptions) have strengths and weaknesses. Rest-rotation systems have worked well in some cases and have failed in others. I recommend referencing Leonard et al. (1997) for a discussion of various grazing "systems."

Other discussions of rest-rotation and other grazing systems are provided in Holechek et al. (2001), Heady and Child (1994), and Vallentine (1990). In all cases problems as well as potential benefits of rest-rotation grazing are discussed. In all cases, the general discussion is that each grazing system works well in some circumstances and does not work well in others.

The Lakeview District might consider using rest-rotation grazing as the "default" system as opposed to the "preferred" or "imposed" system. Allow the permittees and range staff to develop alternative grazing systems that are both feasible and practical for the permittees and can achieve agency management objectives for any given allotment. Don't force rest-rotation grazing if another system is more practical for the permittee and still allows achievement of agency objectives. Language in the RMP/EIS should be clear that flexibility is permitted in prescribing a grazing plan for any given allotment, based on both permittee operations and agency management objectives.

Biological Soil Crusts

Discussion of grazing impacts on biological soil crusts (pages 4-3 and 4-8) should be revised to better reflect what is currently known about different kinds of biological soil crusts, different functions of the various crusts, and differing degrees of crust importance depending on site characteristics (Belnap et al. 2001). To state emphatically that

190-2

190-2: Belnap et al. was analyzed before the writing of this document; we are aware of their findings. See page 4-3 in the Draft RMP/EIS, specifically the reference (*USDI-BLM and USGS 2001*). Also see rewritten text under Chapter 2, Soils, Microbiotic Crusts and Appendix R, in the Proposed RMP/Final EIS.

190-1: See changes in Table 4-1 and in text narrative of the Proposed RMP/Final EIS.

biological crusts would be heavily, negatively impacted because of hoof action, trailing, and other uses of livestock under Alternative D (page 4-8) is not appropriate. The importance of biological crusts varies from site to site and the relative impact of livestock also varies depending on a variety of factors.

Crust cover is inversely related to vascular plant cover. In other words, crusts do not compete well with higher plants, so they are more common where there are fewer plants. When all crust types are considered, cover is greatest at lower-elevation, inland sites (< 3000 feet) compared to mid-elevation sites (3000 to 7500 feet). However, relative lichen and moss cover increases with elevation and effective precipitation until vascular plant cover precludes their growth. Other generalized relationships are: higher crust cover with shallower soil depth and finer soil texture.

Shallow soils often support a wide variety of cyanobacteria, lichens, and mosses regardless of soil texture. Soil texture does influence species composition. More stable fine-textured soils (such as gypsum and silty loams) support greater cover and more varied populations of cyanobacteria, lichens, and mosses, than less stable, coarse-textured soils.

Belnap, Jane, Julie Hilty Kaltenecker, Roger Rosentreter, John Williams, Steve Leonard, and David Eldridge. 2001. *Biological Soil Crusts: Ecology and Management*. TR 1730-2, USDI-BLM National Applied Resource Sciences Center, Denver, Colorado.

Heady, Harold F. and R. Dennis Child. 1994. *Rangeland Ecology & Management*. Westview Press, Boulder, Colorado.

Holecheck, Jerry L., Rix D. Pieper, and Carlton H. Herbel. 2001. *Range Management: Principles and Practices*, 4th Edition. Prentice-Hall, Inc., Upper Saddle River, New Jersey.

Leonard, Steve, Gene Kinch, Van Elsbernd, Mike Borman, and Sherman Swanson. 1997. *Riparian Area Management: Grazing Management for Riparian-Wetland Areas*, TR 1737-14, USDI-BLM National Applied Resource Sciences Center, Denver, Colorado.

Vallentine, John F. 1990. *Grazing Management*. Academic Press, San Diego, California.

27 January 2002
 4602 S.W. 86th Ave
 Portland, Oregon
 97221

Dwayne Sykes
 BLM - Lakeview District Office
 Lakeview, Oregon

Dear Mr. Sykes:

Please consider an improved alternative C
 when drafting plans for the Lakeview area
 BLM Lands. Alternative C fits much closer
 with the recent range science studies being
 conducted in the west. These studies
 state clearly the negative impacts of extensive
 and unrestricted livestock grazing and the
 damage done by off road vehicles.

Thanks.

Sincerely yours,
 Bill Tatham

503-259-4338

Mark Davis
652 SE Washington Street
McMinnville, OR 97128

January 27, 2002

Dwayne Sykes
BLM Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Re: Lakeview Resource Management Plan

Dear Mr. Sykes:

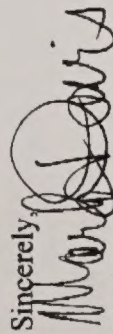
I would like to make the following comments part of the record for the BLM Lakeview Resource Management Plan. I believe that public lands have suffered a great deal of environmental degradation over the past fifty years largely due to poor livestock grazing practices and excessive off-road vehicle use. Any plan that does not deal with these two issues is inadequate to protect the lands under your jurisdiction.

Quite frankly I do not see how the preferred Alternative D is going to help BLM meet its ecosystem management principles. It appears to leave the majority of the land open to off-road vehicles and makes no effort to restrict livestock grazing.

None of the other alternatives are completely what I would like to see, but Alternative C comes closest to representing what I think you should do. You could improve it by setting limits on livestock grazing and closing most of the region to off-road vehicles.

Thank you for considering my opinion in this matter.

Sincerely,



Mark Davis

Dear BLM

The purpose of this letter is to urge you to please choose Alternative C instead of Alternative D in the Lakeview Resource Area Management plan.

ORV use must be curtailed on public lands. The use of these vehicles ~~pollut~~ pollutes the landscape for all of us. Humans, critters and plants included!. ORV use should be limited in the entire Lakeview Resource Area and excluded from the ACEC.

I am strongly opposed to mining and grazing on these lands.

The riparian zones ~~are~~ are a treasure which much be carefully protected.

Let us approach our decisions concerning land use from the mindset of seven generations. So much has been destroyed, let's protect what is left!

Thank you for taking the time to read my letter.

Sincerely
Noah Finner

26 January, 2001

Sent by FAX and US Post

Dwayne Sykes 541-947-6184 FAX: 541-947-6399
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

Please consider these to be my official comments to the Draft Lakeview Resource Area Management Plan. The BLM should chose Alternative C, rather than the proposed "preferred" Alternative D.

1. There should be no designation for ORV use except on road designated for motor vehicle use. There are **hundreds of thousands of miles** of roads on public lands for ORVs to use. Off-road use scars the landscape, destroys wildlife habitat, and seriously degrades wildlife breeding behavior and disturbs their life cycle.
2. ORVs should be excluded from the Sand Dunes Wilderness Study Area [WSA] and Lost Forest Area of Critical Environmental Concern [ACEC] where they currently are wreaking havoc. The BLM should patrol these areas supported by aircraft and violators should be prosecuted.
3. The BLM should recommend Wild & Scenic River [WSR] status for the three streams indicated in the Draft RAMP, and manage them accordingly. The BLM should recommend to the Oregon Department of Fish & Wildlife that these streams be designated as "catch & release".
4. All roads in Special Management Areas [WSAs, ACECs, and WSRs] and riparian areas should be closed. This should be done protect fish and wildlife habitat and to reduce the introduction of invasive species.
5. The existing WSAs and ACECs should be expanded as indicated in the draft RAMP, and the 12 new ACECs should be designated.

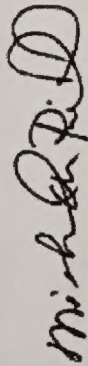
6. Grazing on BLM publicly owned land should be eliminated by reducing grazing allotments 20% immediately, with additional 10% reductions every 5 years thereafter. Grazing in riparian areas should be eliminated immediately.

7. Special Recreation Permits should be granted, but should be restricted to protect natural resource values and wildlife habitat before, not after, damage occurs.

In conclusion, the BLM should recognize the value of the Lakeview RMA for Wildlife Habitat and Low-Impact Recreation and should management accordingly. Commercial use should be excluded except to support limited low-impact recreation. Riparian areas and watersheds should be strictly protected. Grazing should be eliminated. Irresponsible ORV use should not be allowed.

Thank you for allowing me to comment on the Lakeview Draft Resource Area Management Plan.

Sincerely,



Michael M. Piehl

January 19, 2002

Dwayne Dykes
BLM - Lakeview District Office
HC 10, Box 337
Lakeview, OR 97630

Dear Mr. Dykes,

I would like to comment on your Lakeview Resource Management Plan. In 1988 I travelled through the Lakeview area on my way to the Antelope Refuge. I could see that the area, especially the wetlands, was quite impressive. I hope to visit other scenic places such as the Lost Forest, and when I do, I would like to see them in good condition. This means to me, principally, seriously decreasing cattle & ORV use.

I've seen in various high desert areas how degraded land becomes from the impact of cattle & ORV's. Therefore I urge you to adopt alternative C which would exclude cattle & ORV's from important, sensitive areas.

In addition you should avoid using such imprecise terminology as "adaptive management," everything can be measured objectively, & the only way to know if the standards you set are being met is ~~to~~ have objective, definitive standards. Needless-to-say, I hope that the standards that you develop include the

reduction of cattle & ORV's.

Also there are other things you can do to improve the scenic & hiking potential of the area by severely limiting mining; closing roads (especially near streams); designating more streams for wild & scenic River status, & enlarging the wilderness areas.

Thank you for your attention to these comments.

RECEIVED
JAN 30 2002
LAKEVIEW, B.L.M.

Sincerely,
Carolyn Eckel
7238 S.W. Garden Home Rd, #21
Portland, OR 97223

27 January 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

As a former BLM contractor and student of biology, I am writing to express my opinion that the BLM choose a *strengthened Alternative C* in its evaluation of the Lakeview Resource Management Plan.

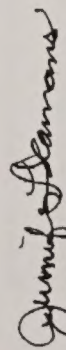
There are a number of reasons I support an alternative C which would exclude grazing and off-road vehicles from sensitive areas. Research from the Forest Service has demonstrated that cattle grazing is an ecological concern because of the extent that it is a vehicle for non-native plant invasion. During journeys on foot into remote areas, I have been disturbed by the sound as well as ecological havoc wreaked by ORVs. It is my experience and opinion that too many ORVs are used in areas where they should not be.

Above all, if we are to truly utilize Wilderness Study Areas and Areas of Critical Environmental Concern for their intended purpose, we have no choice but to remove grazing and ORV use as activities which alter ecosystem function and balance. This is particularly critical during these years that we face water shortages and extremes of fire frequency and magnitude, and also given the consideration that so few lands remain untouched by human-instigated activities such as these. Wild and Scenic rivers, sage grouse mating areas, and grazing allotments in "fair" or "poor" condition also deserve respite from grazing and ORV impacts.

I would also comment to the use of adaptive management in the Lakeview RMP. As a former resident within the Applegate Ranger District/Rogue River NF, I have seen it used in place of sound science toward decision-making. Without the structure and budget to monitor all 3.2 million acres adequately, BLM cannot rely on adaptive management to make decisions that will sustain us years into the future.

In closing, I appreciate this opportunity to comment on the Lakeview RMP, and hope that BLM sees the benefit to land productivity that a strengthened Alternative C would provide. Thank you very much for your time.

Sincerely,


Jennifer L. Seamans
9355 SW 12th Dr.
Portland, OR 97219



Hilary Ort Garrett, MS PT
Physical Therapy

January 27, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10, Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

Thank you for the opportunity to provide comments on the Draft Lakeview RMP/EIS. Please consider my comments, which apply to several issues, as the Lakeview BLM District Office prepares its final RMP/EIS for the Lakeview Resource Area.

Because it does not satisfy the Lakeview RMP's intent of following ecosystem management principles, I urge you to reject Alternative D, and select a strengthened Alternative C. Alternative C comes closer to meeting the Lakeview RMP's objectives by excluding livestock from all riparian areas, designating no acres as "open" to cross-country off-road vehicles (ORV) use, recommending all eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern, designating twelve new ACECs, and limiting energy and mineral extraction throughout the planning area.

I strongly support the designation of all proposed Special Management Areas (ACECs, RNAs, WSAs, etc). These areas should be off limits to grazing, which degrades plant communities, damages archeological resources and artifacts, and harms fish and wildlife habitat. These SMAs represent a small fraction of the District and a smaller fraction of the AUMs available.

- The Lost Forest RNA should be closed in Winter and closed to camping.
- ORV use should be eliminated from all SMAs. Recreation is not a recognized use in RNAs.
- The High Lakes ACEC should be extended all the way north to the Hart Mountain Refuge.
- There should be no road improvements made in SMAs.
- No grazing or ORVs should be allowed in the Black Hills ACEC/RNA and this special area should be fenced.
- Connley Hills should have its grass cells protected.
- The areas just South of Jacobs Reservoir should be protected in the High Lakes ACEC.
- Protection of all rare and sensitive plant species, especially from grazing and ORV impacts, should be assured. In the High Lakes ACEC, a sensitive species (*Agastache cusickii*) has recently been discovered, which warrants further surveys and protective measures.
- ORV use should be prohibited in the Fossil Lake Sand Dunes, as ORV activities are destroying vegetation and dunes. Fossil and archeological resources are also being damaged.

Pertaining to General Management Activities:

- There should be no further water development in pristine playas.
- Guano Creek should be nominated and managed as a Wild and Scenic River.
- Pay more attention to preserving Sage Grouse habitat.
- Shirk Ranch should be protected and maintained as an important historic site, and cows should be fenced out.
- The impact of grazing and ORVs on weed invasion is inadequately addressed in the RMP.
- Fire rehabilitation plans should include only revegetation with legitimate natives from local seed stock. Pay special attention to developing large acreages of Basin Wild Rye stands such as those that existed prior to the advent of livestock grazing.
- You are further degrading the land by revegetation with "exotics".

197-1-1 |

197-1-2 |

197-1-3 |

197-1: Please see responses to comments 185-2, 186-3, 98-1, and 98-2.

There has been no grazing in the Black Hills pasture for the past 5 years. In spring 2002, the permittee will graze this pasture and the effects will be closely monitored to determine if fences around the RNA are necessary to protect the Bureau special status plants/habitat and other values in the RNA (see also Special Management Areas section of Chapter 4).

The Connley Hills are being monitored and studied at present to determine the impact of road use, OHV activities, and erosion. This area, like Fort Rock, Table Rock, and the Black Hills, is a volcanic maar (a volcanic landform resulting from explosive ash eruptions) and is composed of very friable, highly-erosive soils.

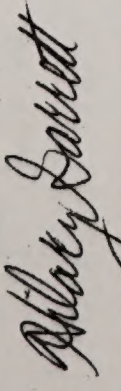
The proposed High Lakes ACEC will be extended to the north to border Hart Mountain National Antelope Refuge as part of revisions to the preferred Alternative D. Refer to Map SMA-16. The resource values of archaeological evidence and cultural plants exist in that area. Also see response to comment 98-2.

The BLM should exclude livestock grazing and ORV use from the proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, all ACECs and WSAs, and grazing allotments that are not meeting management objectives.

The RMP must include objective standards and guidelines so that its success over the next two decades can be adequately gauged. Reliance on "adaptive management" may only lead to further resource damage, as BLM lacks the staff and funding to perform the constant monitoring that adaptive management requires.

I appreciate very much your efforts to update the Lakeview RMP/EIS, and update the wilderness recommendations for the Lakeview Resource Area. Thank you for considering my concerns and suggestions. Please keep me informed of all progress during this project.

Sincerely,


Hilary Garrett, MS PT

197-2: The protection of rare and sensitive plant species is a Federal mandate; however, not all Bureau-sensitive plant species would be fenced to protect them from other uses in the area. Species and habitats would be monitored (see Appendix R) and if grazing by livestock or wildlife is proven to be detrimental, those areas can then be protected by fencing or changes in grazing management. This type of protection or adaptive management can be provided for the entire planning area and is not limited to ACEC/RNA's.

Recreational and OHV use would continue to be monitored within all SMA's (Appendix R). If damage is demonstrated, specific roads and/or areas would be closed or protected.

Also see response to comment 197-1.

197-3: Please see response to comment 98-3.



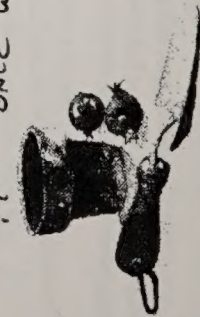
1/25/02

Dear Duayne,

As a citizen of this region I greatly value the diversity of landscape around me. I appreciate the integrity of intact ecosystems both for their residents but also the renewal I find when I visit these areas.

That is why I ask you to manifest Alternative C for the Lakeview Resource Area Management Plan. I especially advocate the limitation of ORV use in this area, to prevent the devastation I feel it causes. I also advocate closing much of the area to energy and mineral extraction, as these practices can drastically affect these areas and their flora and fauna.

Thank you for your consideration, and I hope you can also enjoy this area as it once was.



Sincerely,
Toszi Rounan
Trout Lake
Washington

1/26/02

Dear Mr. Sykes -

I am writing on behalf of the Owyhee Canyon lands of South Eastern Oregon. In order to protect these lands for species and habitat protection there are several necessary measures they are the following:

- Limit off-road vehicle use across the entire Owyhee Reserve area. No public lands should be open to recreation caused by cross-country travel of ORV's.
- Exclude ORV's from the Sand dunes wilderness study area and AEC.
- Recommend wild & scenic river status for three streams and manage them as such.
- Close all roads in riparian areas.
- Add 20,000 acres to your existing RWS and add 130,000 acres to existing RWS.

Thank you -

Carmel Schwenson

Portland OR

RECEIVED
JAN 30 2002
LAKEVIEW, B.L.M.

Dwayne Sikes
RMP Team Leader
Lakeview District HC 10 Box 337

LAKEVIEW, BLM.
JAN 30 2002
LAKEVIEW OR 97630

Sir,

Let me begin by expressing my love of Oregon's High Desert. I have visited Eastern Oregon many times & have always been frustrated at the sight of cows grazing in the most sensitive areas. I have also been depressed by the ORV use further degrading this precious area.

The best solution to fix the egregious problem is to choose Alternative C for the LVAMP!!!
Furthermore

- Reduce grazing by 50% and exclude cows from all riparian areas.
- Significantly reduce ORV use across the entire LRA.
- Exclude ORV's from the Sand Dunes WSA!!! & from the Lost Forest Area of ALCC
- Close 500 miles of roads in GMA & all roads in riparian areas
- Add 2000 acres to existing WSA's. (cont)

Please write me your plans.

Sincerely Donald Fontenot
2230 SE Oak St.
Portland OR 97214

L-200

27 January, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

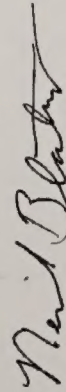
Sir,

The Lakeview RMP that is currently under comment period is what I'm writing you about. First and foremost I would like to thank you for your stewardship of our public lands and hope my comments assist with your decisions.

As a geology student at COCC in Bend, I recall many field trips into that great Basin and range region. The then professor Dr. Nolf, (whom I still can contact) took us around many areas studying rocks in areas like Diablo Mt., Coglan Buttes and of course Abert Rim. My interest in our natural heritage only grew from there. How fragile yet resilient the land is. Which leads me into the reason I'm writing you.

It's in the best interest of the common peoples everywhere to see the land protected from too much cattle grazing and ORV use in WSAs. To put it in a nut shell, I urge you to support a strengthened Alternative C that excludes livestock grazing and off-road vehicles from, Proposed Wild and Scenic Rivers, critical fish and wildlife habitat, ACECS, and WSAs. If the BLM intends to protect these 3.2 million acres for future generations, it must choose a STRENGTHENED ALTERNATIVE C.

for our common heritage, thank you.



Neil Blatner

January 25, 2002
Carmel, Por to
1304 SW Spring Garden St
Portland, OR 97219

Mr. Duwayne Sykes
RMP Team Leader
Lakeview District, HC10 Box 337
Lakeview, OR 97630

Mr. Sykes, Thank you for this opportunity to comment upon the Lakeview Resource Area Management Plan. I urge you to adopt Alternative C for many important reasons.

Especially of interest to me is the protection and management of streams in this area. I am particularly recommending that Honey, Twelve Mile and Grano Creek as wild and scenic rivers. (w.s.r.) These precious streams merit the best protection we can give them.

Related to stream protection, all roads should be closed in riparian areas, as well as the exclusion of grazing. These streams are crucial to the arid ecosystem and demand our attention to their protection.

Other concerns of mine involve human activity in the area. Entry + mineral extraction should be carefully examined and limited. Also recreational ORV use needs to be limited across the entire Lakeview Resource Area. ORV's should be excluded from the Grand Staircase-Escalante Study Area and East West Area of Critical Environmental Concern.

It would be particularly great to add 20,000 acres to the four AOC's and add 130,000 acres to provide new AOC's. This area is

precious to anyone and such a jewel is to
treasured.

Thank you,
Carol Porto

Please let me know & keep me informed as to
what happens to this Management Plan.



1/26/82

14760 SW WEBBARD LN

PORTLAND, OR 97055

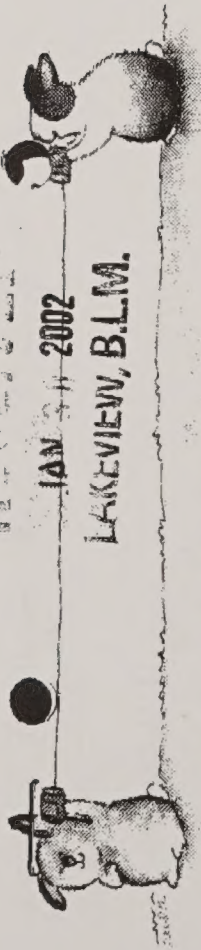
Dear Mr.

Please show let C in the
Lofgren Resource Area Management
Plan

I've been there + we need
to protect it.

T. Hook.

Joe Wobels



HAGE'S THE LATEST

5812 SW 2nd

Portland, OR 97221

Jan 26, 2002

Dear Mr. Sykes:

I am writing to urge you to choose Alternative C for the Lakeview Resource Management Plan. I would like to see Off-road vehicle use limited across the entire Lakeview Resource Area, and excluded from the Sand Dunes wilderness Study Area + Lost Priest Area of Critical Environmental Concern.

I would also like to see road closures in Special Management Areas and all roads closed in riparian areas.

I would also like to see decreased grazing for Mining.

I urge you to choose Alternative C to best protect this beautiful area.

Jeffrey K. Fryer
Jeffrey K. Fryer

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1-26-2002

TO: D. SYKES
BLM - Lakeview Dist
Lakeview, OR

SUBJECT:
Mgmt. Plan
Lakeview Res. Area

RE: Lakeview Resource Area Mgmt Plan

- I am writing to support Alternative C. I feel it is necessary to close this fragile area to all off-road ORV cross-country travel to eliminate damage to the environment, to wildlife habitat, and to eliminate vandalism.
- all riparian areas should be protected by closing all roads in these fragile areas.
- all roads in the following Special Mgmt Areas such as the WSAs, ACECs, and WSRs - close all roads here?
 - Re the four ACECs, add 20,000 acres
- grazing should be limited by at least 20%, and exclude it from all riparian areas.
- ORVs are causing considerable damage in the following areas and they should be excluded from the Sand Dunes Wilderness Study Area (WSA), and Lost Forest Area of ACEC
- large areas should be closed to energy and mineral extraction
- Special Rec Permits should be limited!!

• I support Alternative C

KINDT VIELBIG
↓
KINDT VIELBIG
4214 NE Hazel Fern Place
Portland, OR 97213

Wayne Sykes
Lakeview District
HC 10, Box 337
Lakeview, OK 97630

January 23, 2002

Dear Mr. Sykes,

I am writing about the Lakeview Resource Area Management Plan, and encourage you to choose Alternative C. As a native Oregonian who was raised on a ranch, I have seen first hand the kind of destructive effect cattle grazing and other overuses of land can have on the native habitat. The Lakeview area is a treasure - not just for Oregonians but for the entire nation. Such landscapes are being altered on a wide scale, and if changes in management practices don't occur, the area will turn into a degraded wasteland. Action needs to happen now, and Alternative C includes the types of actions that must happen now in order to prevent ecological collapse.

In Montana, OLV use is at an all time, unregulated high. OLVs should be completely prohibited from the entire area. Wild & River Run status should be given to Henry Creek, 12 mile Ck and Grass Ck - they deserve it! All roads should be closed in all special Management areas. Additional acreage - at least 20,000 acres should be added to the existing HES. The entire area should be closed to energy & mineral extraction.

Thank you for considering Alt. C. It is the only responsible, moral choice.

Sincerely, Land Scherz

Land Scherz
2946 NE 9th
Portland, OR 97212

Burkyns Sykes, RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to support Alternative C for Management of The Lakeview Resource Area. I am particularly concerned about consequences the native plant habitat in this area. More and more of our lands in Eastern Oregon are being taken over by non-native species such as cheatgrass. Limiting ORVs and protecting riparian areas by managing streams as wild & scenic rivers will improve native habitat. Grazing is also a major concern in damaging habitat of spreading non-native plants in these areas. Mining is a concern throughout the West under the current laws, with areas open to additional loads of destructive mining practices with little external review for environmental impact of economic feasibility. For these reasons, at minimum, I support Alternative C.

Nancy J. Chapman
Nancy J. Chapman
4214 NE Hazelton Pl.
Portland, OR 97213

Dear Sirs;

As this is public land, it belongs
to all of us!

As such, I implore you to adopt
Plan C. This land does not need
cattle grazing, off-road vehicles or
any other form of human intervention,

This area ought to remain a
wilderness and this means no
roads!!

Please remember this land belongs
to all of us, listen to us, those of
who have taken time to make
their plea.

Regards

Mick Parr

To the Bute

I believe it is important to choose Act C of the habitation management plan to preserve the natural state and beauty of the area. All the many parts of our world have been invaded by humanity and irreparably changed by our hunger to utilize.

It would be nice to preserve the three rivers as WSRs, to in general limit vehicular access, both on and off road, and to avoid extract of natural resources and the consequent environmental damage that would result.

I have visited many parts of the world and originate from the UK. Believe me there are few places left in the world where the majesty of nature is as apparent as in Oregon. We need to keep it this way for our children & for theirs

Harry Anderson
SO3 645 7356

Rob and Marie Holt
15959 SE Keller Rd.
Clackamas, OR 97015
January 7, 2002

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

I am writing to urge the BLM to choose Alternative C of the Draft Lakeview Resource Area Management.

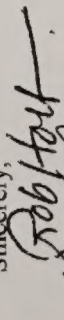
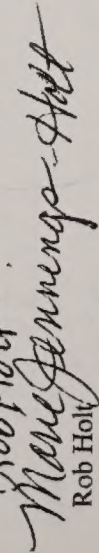
The tremendous growth in ORV use on BLM lands has left the BLM unable to cope with the damage done to sensitive habitat and unable to prevent further damage.

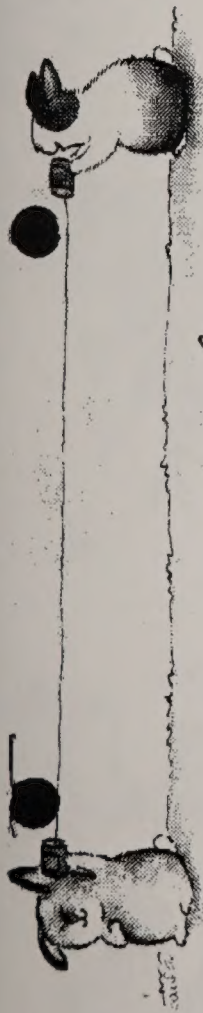
Since this is a problem for which you don't have resources it makes sense to ban ORV cross-country travel in the entire District. In addition Alternative C would recommend Wild & Scenic River status for 3 streams, increase the acreage of some Wilderness Study Areas, and add or create new Areas of Critical Environmental Concern.

ORV use has critically damaged many areas of the Lost Forest Area (an Area of Critical Environmental Concern) and the Sand Dunes WSA, which as I understand should have nothing happen to it that would degrade its potential for wilderness. Alternative C would prevent further degradation.

Alternative C would also protect riparian areas and reduce grazing. I urge you to choose Alternative C. Thank you.

Sincerely,



Rob Holt
Marie Jennings-Holt



HERE'S THE LATEST

Jan 26, 2002

Mr. Sykes

Our rafting trip from Rome to the reservoir in 1988 was the most unusual, peaceful, beautiful, vacation I've had.

I'm writing for the Lakeview Resource Area Management Plan Alternative C to be selected by the BLM to protect Oregon's Quigley area from ORV's, overgrazing, mining and other activities that could change this area and destroy the species and ecosystem.

Sincerely,

Maryanne C. Curtis

11215 NE 42nd Ave

Portland OR 97213

1623 SE 52nd Ave
Portland OR 97215
January 26, 2002

Dear Sir or Madam:

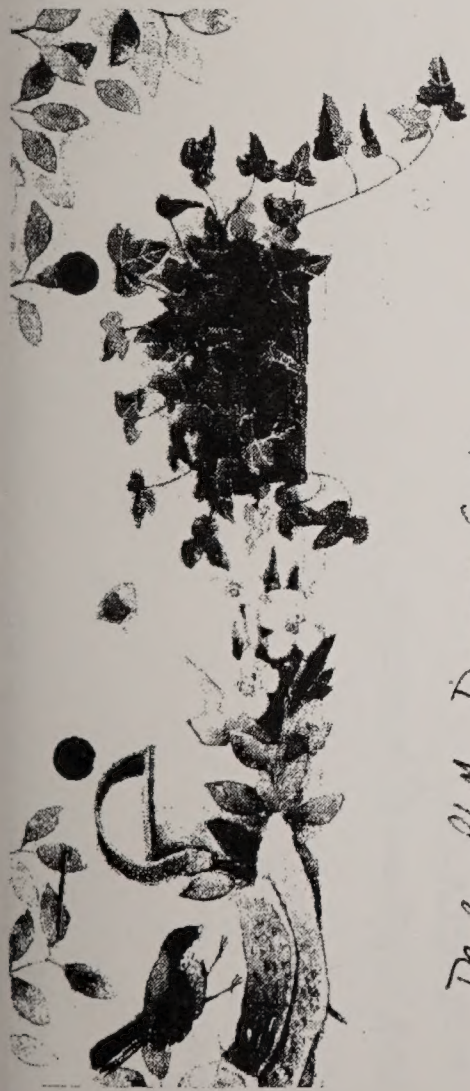
I am writing to support alternative C in the Lakeview Resource Area Management Plan. I support exclusion of off-road vehicles from wilderness study areas including the Sand Dunes Wilderness area and the Lost Forest Area of Critical Environmental Concern.

I also support exclusion of cattle from riparian areas and closure of roads in riparian areas. Energy and mineral development should be sharply restricted.

I also support all proposed wild and scenic river designations.

Sincerely,

Deft Lockwood



Dear BHM, Douglas Sykes

I ask you to protect & preserve
The highest level of reason.

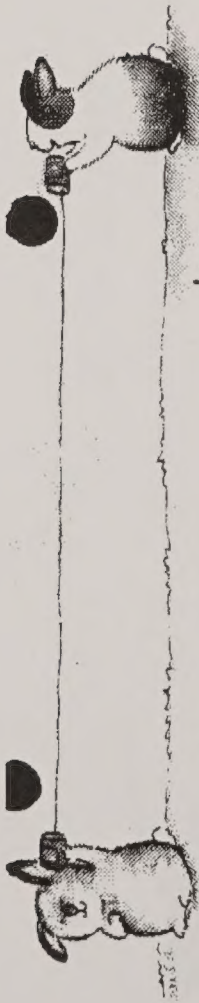
I request you choose "Alternative C"
of The Fallacies Reasoner Series.

I am a minister of the high church
in which I go to church my soul & my
spirit.

Alternative C ends the descriptive & damaging
use of C-V's. Also reduce the use of
giving in the area.

Pete J. H. W.
P.O. Box 877
in line with 95629





JAN 26, 2002

TO DWAYNE SYKES
RMP TEAM LEADER, LAKEVIEW DISTRICT
HC 10 BOX 337
LAKEVIEW, OR 97630

I WOULD LIKE TO COMMENT ON YOUR
LAKEVIEW RESOURCE AREA MANAGEMENT
PLAN PRESENTLY BEING REVIEWED. PLEASE
CONSIDER ALTERNATIVE C - LIMITING
ORV'S; MORE WCA'S; REDUCTION IN
GRAZING; LESS PERCENTAGE OF AREA
FOR ENERGY + MINING.

THERE ARE IMPORTANT FOR THE FUTURE
ENJOYMENT OF THE WILDERNESS &
PRESERVATION OF THE ENVIRONMENT.

Sincerely,
Rustia Ch

© Hallmark Cards, Inc.

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview, Oregon 97630

Comment Re Lakeview Draft Resource Plan

Dear Mr. Sykes:

Plan D if adopted is still scary since you indicate it will probably be revised. My fear would be that more areas would be taken away from public use. Since this is the alternative you favor I would like to comment as follows.

- #1 No on the part of A which would expand acreage to ACEC
 No on B which would designate 123,656 acres of more ACEC's.
 No on D to add 1,194 more acres to Three Wilderness Study Areas.

- 215-1 | #2 Yes on A, the treatment of invasive juniper stands. I would hope this could be treated as a resource for possible economic development.

 No on C. Unless this would keep wildlife from feeding in the fields of ranchers and farmers.

- 215-2 | D - Expand forage for livestock, do not leave as is. In one part of the draft livestock was blamed for all degradation of land, in another it was said that there was no proof that this was so. I believe appropriate use should be made of public lands and a fee charged.

- 215-3 | #3. D. This is very scary. Who determines what the negative impacts on aquatic habitat are and to what degree are they to be eliminated? If it is back to the condition before there was human habitation or domestic animals I would say No.
 No on E Listen to people in the area who have observed these fish for generations and know that they have survived through every condition possible.
 F. YES

- #4. B. Yes

- #5. A. Increase present commodity production - livestock, grazing, mining
 B. Yes
 C. Yes

- 215-4 | D. What would this mean in terms of sites and acreage? No one group should

215-1: Treatment of invasive juniper trees would be accomplished by a combination of public cutting (for small quantities of firewood, posts, and other products), commercial cutting (for larger quantities of firewood, posts, and other products), and cutting by a BLM crew or contractors (where cut trees are left in place or piled for burning). Commercial cutting would be a direct economic benefit locally, since it would involve employment of people to cut juniper trees and market the products. Contract cutting would involve payment to contractors by the BLM to perform treatments, either by chainsaw cutting or use of a cutting machine (shear). Recovery of cut juniper material for biomass in the production of electricity is also a potential use allowed under Alternative D. All of these treatments would be economically beneficial to local residents and the local economy.

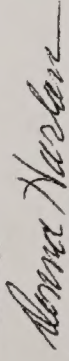
215-2: Alternative B increases the forage allocation for livestock, but Alternative D uses the current allocation, which was previously determined and has been adjusted based on years of rangeland monitoring. Currently, every allotment is evaluated through the Rangeland Health Standards and Guidelines process, and the livestock number or grazing period is adjusted if the guidelines are not being met. Should additional perennial forage become available and documented through rangeland monitoring, the permitted number of livestock may be increased to utilize this forage. The RMP does analyze the impacts of grazing on several resources and there has been degradation in the past. Your question, however, does not refer to a specific section or statement in the RMP, so to respond further, we need more information. A grazing fee is charged to the grazing permittee for every AUM of grazing on public land.

be favored. This is reverse discrimination. We should respect a site if it has true cultural significance but be selective. These areas should not be kept from general public use.

E. Yes. What restrictions? Would this be like saying yes but meaning no?

I believe in multiple use of the land and I believe in protecting and conserving the land but I don't believe in locking up lands. Most of your Alternative D seems reasonable but much of it could be interpreted in a way that would mean more restrictions. I hope this is not the case.

Sincerely,



Donna Harlan
1121 So. 4th St.
Lakeview, OR 97630

215-3: Impacts will be assessed based on management effects to specific habitat components and goals, as described in a range of desired future conditions.

Impacts will be measured by riparian score card and stream channel geomorphology using repeatable, measurable standards. The area manager will set the goals for a site based on all the resources affected, current condition, and site potential. The description of potential will consider the current setting, not presettlement conditions.

215-4: There is not enough specific information (page numbers, section titles, etc) for the BLM to determine the exact nature of the comment. If you are referring to Native American religious use of public lands, the "American Indian Religious Freedom Act," as well as existing Executive orders, require the BLM to consider such uses. This does not necessarily preclude other public uses.

Jan. 31, 2002

Dwayne Sykes, RMP Team Leader
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630
Fax: (541) 947-6399

RECEIVED
FEB - 4 2002
LAKEVIEW, B.L.M.

Re: Comments on the Lakeview Resource Management Plan and Environmental Impact Statement

To: Dwayne Sykes, Bureau of Land Management
From: National Sierra Club Grazing Committee

Thank you for this opportunity to comment on the Lakeview Resource Management Plan and Environmental Impact Statement. The opportunity for public comment is an essential component of a functioning democracy, and the Sierra Club applauds the Lakeview District Office of the BLM for its forthright disclosure of information concerning current and past resource conditions on the Lakeview District area.

A fundamental mission of the Sierra Club is to protect the wild places of the earth and to enlist humanity in efforts to protect and restore the quality of the natural and human environment. The Sierra Club relies on sound, biological principles to guide its policy goals and decision-making, with a particular emphasis on conservation biology. The Sierra Club currently has over 700,000 members.

On September 24, 2000, the Sierra Club Board of Directors adopted a new "Federal Public Lands Grazing Policy" (PLGP). The Sierra Club recently created a national level committee (titled the National Sierra Club Grazing Committee) to address this policy within the context of both Sierra Club internal affairs and to aid in the creation of a Club wide campaign to address the environmental degradation caused by grazing. The following comments on the Lakeview RMP/EIS are presented on behalf of the members of National Sierra Club Grazing Committee.

To start, we concur completely with the comments, arguments, and recommendations submitted by the Juniper Group of Sierra Club's Oregon Chapter. The Juniper Group comments constitute the formal Sierra Club comments on behalf of over 700,000 Sierra Club members. We have reviewed the Juniper Group comments and believe that they conform with the Sierra Club's "Federal Public Lands Grazing Policy".

Moreover, we want to reiterate our strong support for the Juniper Group recommendations that the BLM seriously consider permanent removal of livestock from areas now rated in unsatisfactory condition, as well as livestock removal from all sage-grouse leks, related sage-grouse habitat, Areas of Critical Environmental Concern,

216-1

Given that two-thirds of the total Lakeview Resource Area acreage under BLM management currently exhibits unsatisfactory resource conditions, 67 percent of sagegrouse leks occur on those grazing allotments with unsatisfactory resource conditions, and sage grouse have experienced a 30% decline over the past 30 years on Lakeview Resource Area lands, we believe that the Juniper Group recommendations, if implemented, will help promote the primary goal of the Sierra Club federal public lands grazing policy, which is "to protect and restore native biodiversity and achieve functional and self-sustaining ecosystems" (PLGP).

Because these arid BLM lands in question have also experienced significant water quality degradation, we believe that the Juniper Group recommendations are consistent with the Sierra Club priority to "work toward ending commercial grazing on federal public lands where . . . average annual precipitation [is] 12 inches or less . . . Associated activities (e.g., water developments, predator control, vegetation manipulation) are occurring in such a manner that native plant and animal species are significantly impacted. Grazing is causing degradation of habitat necessary for threatened, endangered or sensitive native plant and animal species. Grazing is causing significant degradation of water quality" (PLGP). In short, the National Sierra Club Grazing Committee recommends that the BLM adopt and implement the Juniper Group management prescriptions discussed above

The Juniper Group comments also raise some serious questions about the BLM's intention and ability to use "adaptive management" to meet the goals and objectives of this RMP. If extensive use of adaptive management is necessary to protect and promote the health of the lands in question but the BLM does not have (or is not likely to get) the financial or human resources necessary to accomplish any aspect of adaptive management on a continuous basis, then we believe that the BLM should seriously consider removing these lands from livestock grazing. Sierra Club policy is very clear on this point: "the Sierra Club will work toward ending commercial grazing on federal public lands where . . . [t]he public land management agencies have insufficient funding, staff, and determination to create and administer monitoring systems that will provide reasonable assurance that adverse impacts will be minimized and opportunities for restoration taken advantage of" (PLGP).

216-2

We wish to elaborate more fully concerning the question of grazing-related monitoring on the Lakeview RMA in general. The grazing allotment assessments appear to be far below what a reasonable person would expect in terms of frequency and quality. The 'cursory' character of assessments described in the RMP/EIS would not meet the expectations of a business manager conducting quality control studies on his product.

Aside from the infrequency, the Bureau of Land Management often makes two kinds of errors in range assessments. First, the allotment is often discussed in terms of permitted or allowed AUMs. In practice the number of AUMs allowed in a permit vary greatly from the actual number of AUMs stocked on the allotment. While a few allotments may

216-1: The statement that two-thirds of the acreage in the LRA is in unsatisfactory condition is inaccurate. The ecological site inventory of the LRA is still in progress, but with over 2 million acres completed, it shows 21 percent of those acres to be in early seral or what may be referred to as "unsatisfactory" resource condition. Using the best information available for the remaining acreage, it was determined, that at most, about 25 percent of the total acreage in the resource area may be in early seral condition.

Of the 932,305 acres that do not have complete ecological site inventory information, about 56 percent of that is in the ZX Allotment (103). We recently completed an allotment assessment and determined that 8 percent of the allotment (41,600 acres) is in unsatisfactory resource condition. An allotment management plan for the ZX has been prepared to address those areas, and a significant change in the grazing system should greatly improve those areas.

There are 410,214 acres left in resource area on which the ecological site inventory survey is not yet summarized, and about 269,698 (66 percent) of these acres are in I allotments that were rated unsatisfactory in 1982. When the early seral acres (435,570) from the ecological site inventory are added to the 41,600 acres from the ZX allotment and the 269,698 acres from the remaining I allotments, a total of 746,868 acres (25 percent) could be rated as unsatisfactory. This number will be lower when the final ecological site inventory data is completed; not all the acreage in the I category allotments will likely be in the early seral stage.

Assuming that the two-thirds calculation in your comment came from the management categorization of allotments, it is necessary to explain how the management categorization was developed and used. In Chapter 2 of the Proposed RMP/Final EIS, under the Allotment Categorization/Grazing Systems section is a description of the three selective management categories (which has been modified from the Draft RMP/EIS). Under the I category allotments the word *unsatisfactory* has been changed to read, *are managed to improve current resource conditions*. This change was made because when the allotment categorization was done, range condition was only one of six criteria, and nine I category allotments that had satisfactory range condition were placed in the I category for reasons other than range condition. In reviewing the original rating sheet, it is apparent that to be rated "unsatisfactory," only a portion of the allotment needs to rate in fair to poor condition. Therefore, even the I category allotments that were given unsatisfactory condition ratings have significant acreage in satisfactory condition.

The selective management category method has been used effectively to identify which allotments needed better management and had resource conflicts, and the best potential for improvement of resource conditions. Since 1982, when this categorization was done, many of the I category allotments have undergone

occasionally be overstocked, it is more likely the allotment will be under-stocked. In either case the result is a complete loss of monitoring integrity. If an allotment permits stocking with 1200 AUMs over a three month time period but is only stocked with 300 cows or cow-calf pairs for the three months, that means only 900 AUMs were actually used. Should an allotment assessment indicate over-utilization of forage in the allotment the BLM might reasonably require a 20 per cent reduction in stocking rates. Thus the BLM would reduce the stocking level by 240 AUMs, leaving 960 AUMs in place. This reduction would not make any impact on the actual stocking level and thus make no impact on forage utilization. In order to reduce stocking by 20 per cent, the number of AUMs should have been reduced from the actual stocking level by 180 AUMs with a resultant stocking level of 720 AUMs. In order to move towards management objectives, the stocking level should have been reduced to 60 per cent of the permitted stocking level rather than the misleading 20 per cent reduction. The foremost requirement to manage grazing would be an accurate measurement of stocking levels. The RMP/EIS should clearly delineate how stocking levels will be measured and the frequency of measurement. Without this information no adaptive management system or any other system will result in improved range conditions.

216-3

The second major error in allotment assessments comes from the way forage availability is predicted and forage utilization is measured. Available forage is generally derived from analysis of soil types and vegetative cover with a predicted plant density for various grasses, forbs and shrubs. Often this is combined with average precipitation for an allotment or region. When this analysis is used in determining stocking levels, a number of problems can arise. Forage utilization measurements come from cursory visual assessment. There is seldom an attempt to rectify on-the-ground, objectively measurable forage with predicted forage. Some of the assessment sites which actually are measured are remote from areas where grazing actually occurs. Thus the sites where forage is somewhat objectively measured may have no relationship to actual grazing utilization. It is important that all forage measurement plots lie within areas that are actually grazed and reflect the range of forage utilization. It makes no sense to use upland hillside forage measurement plots to determine forage availability or utilization if most of the grazing is within the riparian zone or immediately adjacent lands. Since the predicted forage is based on soil type, vegetative type cover and average rainfall, the adjustments to grazing generally lag far behind actual forage availability. That is, the stocking level remains too high through the first years of a drought or even remains high in a period when average annual rainfall falls well below average without the apparent drastic signs of drought.

216-4

Currently the BLM has a framework for estimating forage availability and utilization. Unfortunately the data is scattered over various forms with little of it correlated with crucial information on other forms. None of this is readily available in databases and plotted in a GIS layer. Thus, no means for adequate analysis is readily available. Usually forage availability is strictly determined from the soil, vegetation, and rainfall analyses on a theoretical level. Rarely is there any objective measurement of actual forage available. It would be a simple step to sample plot cuttings to determine the weight of actual forage available from grasses, forbs, and shrubs and compare this with predicted availability from modeling soil type, predicted vegetation, and average rainfall. Allison Jones, lead

216-5

management changes and many are in better condition than they were in 1982. The current Rangeland Health Standards and Guidelines (USDI-BLM 1997a) process evaluates each allotment, and if there are problems due to livestock grazing, they are addressed before the next grazing season. An example of this process is the ZX Allotment (103) described earlier in this response.

Livestock grazing in allotments with greater sage-grouse habitat are being addressed through the Rangeland Health Standards and Guidelines (USDI-BLM 1997a) process on an individual allotment basis. If problems are identified, changes would be made. Livestock grazing in WSA's is done in accordance with the wilderness IMP (USDI-BLM 1995b). Livestock grazing in each ACEC is addressed individually in the Proposed RMP/Final EIS in Table 3-3 and in the Special Management Areas section of Chapter 3.

216-2: Table 2-28a contains a summary of the assessments for rangeland health and grazing management guidelines completed in the planning area. The assessments completed since 1998 represent 49 percent or 1,469,959 acres of the planning area. The assessment process will continue through 2008, at which time the entire planning area will be completed.

216-3: *Permitted use* is that portion of a term grazing permit that may be authorized annually. Individual livestock permittees may elect to run fewer cows than permitted due to market or environmental conditions. A condition of term grazing permits requires that actual use information be submitted annually. This information accurately depicts livestock use as compared to what was licensed. Any changes in permitted use must be supported by monitoring information. As identified in the 1982 livestock grazing EIS, monitoring data is collected yearly on pastures utilized for all I and M category grazing allotments. Through an allotment evaluation process, or an assessment for rangeland health and grazing management guidelines, allotments are periodically reviewed in accordance with 43 CFR 4110.3, and any needed adjustments to stocking levels are made accordingly. The monitoring plan in Appendix R identifies the types of monitoring information and frequency of collection. See also comment response 216-2.

216-4: During the late 1950s and early 1960s, a range survey and adjudication process was completed for all grazing allotments in the planning area. The survey and adjudication took into account suitability, including steepness of slopes for livestock use and forage availability, and was adjusted accordingly. Precipitation data is factored into utilization through a crop yield index, which adjusts utilization based on the moisture received during the year. Livestock forage use is measured by various methods in the planning area. The most prevalent are actual use, use pattern mapping, key forage plant method, and trend. Actual use is submitted annually by livestock operators for what occurred in a specific pasture during the designated use period. Use pattern mapping

216-5

researcher, and Jim Catlin of the Wild Utah Project are currently researching this exact problem (personal communication). Ms. Jones will soon be publishing a peer-reviewed article addressing these very problems. The managers of the BLM Lakeview Resource Area should be following current research and incorporating the best science into grazing management.

216-6

In any case, current research should have an impact on grazing management and economic analysis of grazing within the community. The actual costs of doing acceptable management needs to be incorporated into the economic model for continued grazing. The Lakeview RA managers should know the true value of its inventory or resources offered (actual forage availability), the actual reduction of inventory (true stocking levels), and the resultant ability of the inventory to recover. The Lakeview RA should be managed for the long-term ecological gain of all Americans and not the short-term financial gains of a few people. The United States can find a better means of looking after the welfare of its citizens than short term subsidies for destructive practices which can only lead to continued deterioration of our last great places -- the public lands that we now know are a part of our heritage and responsibility.

216-7

Finally, we request that the BLM provide a more balanced perspective concerning its discussion of the "no grazing" alternative (Alternative E). The supposed negative economic consequences of such an alternative are likely to be balanced by positive improvements in ecosystem condition that will support substantial economic activity related to improved hunting, fishing, and wildlife/native flora-associated recreation opportunities. It is also likely that adoption of any such alternative would be accompanied by congressional action to mandate the government purchase of grazing permit privileges at terms that would be generous to any affected grazing permittees. We, therefore, request that the BLM assess the economic consequences of a "no grazing" alternative which includes provisions to enable government purchase of affected grazing allotment permit privileges at a fixed rate of 175 dollars per animal unit month. Again, such analysis should not discount the positive economic effects that are likely to be generated by the more rapid rates of ecological recovery associated with implementation of such a "no grazing" alternative.

Again, we wish to thank you for this opportunity to comment.

On behalf of the National Sierra Club Grazing Committee,

Wayne Y. Hoskisson, Interim Chair, National Sierra Club Grazing Committee

Wayne Y. Hoskisson
Todd M. Shuman, National Sierra Club Grazing Committee

Todd M. Shuman
John G. Carter, National Sierra Club Grazing Committee

John G. Carter
George Wuertner, National Sierra Club Grazing Committee

George Wuertner

identifies livestock use patterns, including areas not suitable or unused by livestock. The use maps help identify key areas, which measure changes in soil, vegetation, and the impacts of grazing. Thus, the use pattern mapping and identification of key areas ensures that utilization measurements are taken where grazing actually occurred. Key areas also reflect grazing management over similar areas within the pasture where a significant amount of forage is available. The key forage plant method measures utilization at the key areas through an ocular estimate of utilization. Data collection includes calibration by clipping individual plants to determine availability and the percent of the current year's growth that has been removed. Trend data collection identifies whether rangeland vegetation is being maintained or moving away from its potential or resource objectives. See the monitoring plan in Appendix R for a complete description of livestock grazing monitoring.

216-5: All utilization data collected for each allotment is stored in allotment files. Ecological site inventory data collection is available for much of the planning area. As part of the data collection, plots are sampled for estimation of forage production and availability. A complete description of the information gathered during the ecological site inventory is explained in Appendix C2 of the Draft RMP/EIS. A portion of the data is currently available in a geographic information system database. However, the survey is scheduled for completion in 2003, at which time all inventory data will be included in a geographic information system database. This information is currently utilized in the assessment of the rangeland health and grazing management guidelines.

216-6: Benefit-cost analysis or other economic modeling tools examining the entire economic system were not used in the preparation of the economic analysis of grazing impacts within the community. The scope of the analysis was limited to the estimation of changes in livestock sales associated with alternative levels of authorized livestock used on public lands within the LRA.

216-7: Alternative E would result in various changes in specific resource and ecosystem conditions. These changes are described in appropriate sections within Chapter 4 in terms appropriate for each resource value. The suggestion to obtain congressional action to mandate government purchase of grazing permit privileges under Alternative E represents a highly speculative action that is not a "reasonably foreseeable action" and is, therefore, not included in the analysis.

Wayne Y. Hoskisson, 263 S. 100 E. Moab, UT 84532
Todd M. Shuman, 605 South Adams St. Apt G, Glendale, CA 91205
John G. Carter, 250 South Main P.O. Box 280 Mendon, Utah 84325
George Wuerthner, POB 3156, Eugene, Oregon 97403

Cc: Senator Ron Wyden
Kathleen Clarke, Bureau of Land Management

Dwayne Sykes
RMP Team Leader
BLM
HC 10 Box337
Lakeview OR 97630

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Please enter the following into the record as comment on the Lakeview Draft RMP/EIS

Submitted by:
John O'Keeffe
Permittee Lakeview District
Oregon Director, Public Land Council
Chairman, Public Land Committee, Oregon Cattlemen's Association

WEEDS

The draft is deficient in addressing noxious weeds. Specifically, the RMP should recognize specifically the seriousness of the Pepperweed problem in the Warner Wetlands. The bureau should commit to seeking project level funds to appropriately treat all know infestations within two years. The bureau should commit to seeking emergency relief from the pesticide injunction so that appropriate chemicals could be used.

In several places the draft notes that weed control is only effective when done in an integrated fashion and when all landowners are involved. What also needs said is that when new infestations occur, the ability to timely treat a site with the correct chemical eliminates the need to do other integrated weed management activities as well as eliminating the need for neighboring land managers to address that weed issue, thus freeing up time and resources for other activities.

ETHNICITY

The draft spends some time discussing ethnicity of the region. Mention is made as to why the type of agriculture in the region attracts less Hispanic ethnic groups than other regions. However, no mention is made of the historic Irish ranching community present in the region, assumedly this is an oversight or a technicality and not a bias.

STANDARDS

Page 2-40 the draft addresses workload conflicts in assessing standards. It is not clear what is

217-1: Granted, the pepperweed problem in the Warner Wetlands is serious. However, the RMP is not meant to be a plan for site-specific management. No weed species are specifically identified for treatment in the document except for the medusahead in the proposed Red Knoll ACEC. Weed management in the Warner Wetlands is stated as being managed according to the "Warner Basin Weed Management Area Plan" (USDI-BLM 1999g), in which pepperweed is identified as a priority species for control.

Regarding seeking project-level funds to treat all known infestations in 2 years, we are assigning pepperweed treatment in the wetlands this year to the Oregon Department of Agriculture. As for emergency relief from the injunction, we have been told by our solicitor in Washington, D.C., that no movement will be made on lifting the current injunction against the use of certain herbicides on BLM-administered lands in Oregon until a record of decision for the new "Conservation and Restoration of Vegetation and Habitat Treatments National Programmatic Environmental Impact Statement" is signed, perhaps in 2 years. The plaintiffs argue that the current EIS for vegetation treatment (USDI-BLM 1991b) in the 13 western states is outdated. The new EIS should eliminate this argument.

Language has been added to the text in Chapter 2 about the injunction limiting our efforts, and in Appendix G explaining why Oregon is limited to certain chemicals.

217-2: Ethnicity is discussed in Chapter 2 to support analysis and conclusions required under Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. While the BLM recognizes the importance of the historic Irish ranching communities in Lake County, they are not a group identified by the Executive order. No bias was intended by the discussion. No actions related to this plan relate specifically to this historic community, and no impacts are expected to disproportionately affect this group.

217-3

meant by a standard stipulation in the terms and conditions of the permit. The draft should clearly state that except under emergency conditions the permit would continue as is until proper assessments could be completed.

IMPROVEMENTS

217-4

Page 3-70 Alt D the draft states that improvements will only be allowed if they enhance resource values and meet management objectives. It is unclear if improvements that are resource neutral, but have value for a permittee would be allowed. Clear language should be inserted that improvements that do not impede resource objectives will be considered on a case by case basis.

LOCAL ECONOMICS

217-5

Page 3-70 Alt D here and in other places the draft clearly states that the intent is to continue grazing at present levels. Yet on page 3-105 Alt D it is stated that new reduced commodity levels would be established for the livestock industry. It is not appropriate to change the intent of an alternative within the draft, the language in 3-105 Alt D needs to be modified to create consistency.

217-6

The economic benefit of the crested wheat seedings should be recognized in the draft as providing economic benefits to local businesses is one of the stated goals of the RMP. Crested wheat seedings provide available forage earlier than most native sites. Local ranches benefit by either winter grazing or earlier turn out on crested wheat seedings.

CRESTED WHEAT

217-7

Page 4-13 1st paragraph 2nd column the draft refers to crested wheat seedings as a degraded condition. This shows bias in the document. There may be reasons not to advocate additional landscape size crested wheat seedings, but the economic, water quality, and fire management goals found in this draft are better served by crested wheat seedings than they would be by native vegetation, especially when the expense, availability, and difficulty of establishment of native species are considered. Page 4-8 Alt D discusses shrub reintroduction as a way to maintain diversity. Except in the case of very large blocks where specific habitat needs are identified this adds unnecessary expense to rehabilitation. Once a competitive perineal species is established (crested wheat) to compete with the undesired annuals (cheat grass) the watershed and fire cycle is stabilized and the shrubs will come in on their own in about 30 years. This would free up resources for weed treatment or other more serious threats to diversity. Also in no case would it be justified to actively seed native species into existing crested wheat seedings.

217-3: The standard stipulation is BLM policy, identified in the appropriation acts for fiscal years 2000, 2001, and 2002. The policy states that if a term grazing permit is renewed, and due to workload, the assessment for rangeland health and grazing management guidelines is not completed as part of the permit renewal process, a stipulation shall be included in the term grazing permit. This stipulation would identify that the assessment has not been completed, but will in the future, and if a standard is not met, it may require future changes in grazing management.

217-4: All rangeland improvement projects will be evaluated on a case-by-case basis as they relate to meeting resource objectives.

217-5: The text has been corrected to be consistent.

217-6: The economic benefits of existing crested wheatgrass seeding to the livestock industry and the local community are captured through the estimates of forage availability (AUM's) by alternative. Management of existing seedings and any new seedings would impact the livestock industry and the local community if administrative changes in forage availability result.

217-7: There was no intention of describing crested wheatgrass seedings as a degraded state. The ultimate goal of ecosystem management is to produce high biodiversity and sustainability in plant communities. Crested wheatgrass seedings serve a purpose for livestock grazing management; however, they generally create a monoculture with little or no plant diversity, depending on the extent to which the seeding has been recolonized by native vegetation. Crested wheatgrass, if grazed properly, usually prevents the invasion of undesired annuals. However, there are places in the resource area where these seedings have an understory of cheatgrass and noxious weeds. This introduced perennial grass is much more tolerant of heavy livestock use and may last for several decades. The long-range concerns are that the introduced perennial grass suppresses the return of native species, and thus richer plant species assemblages. The lack of diversity limits the uses of these seedings by a diversity of wildlife.

SMA's

The establishment of the High Lakes ACEC may be counter productive. No livestock conflicts with its values have been identified in the last 20 years of fairly consistent management. The tribes already know the area and can use it in its present designation. Any conflicts generated by the general public either in cultural resource or plant gathering will be aggravated by the higher profile accompanying a designation.

217-8

Page 4-95 Alt D States that protection would be provided by limiting . . . livestock grazing. There is no explanation given in the draft for the need to limit grazing, no conflicts in this area have been brought to the permittees attention in 20 years of actively managing the permit. Clearly it is premature to suggest that grazing cuts are needed on this ACEC. Also the other alternatives, where appropriate contain language that allows grazing under the restrictions as listed in impacts common to all alternatives. This language is not present under alternative D, assumingly an oversight. These two changes need to be reflected in the final RMP.

217-9

Page 4-94 Alt C the 3rd sentence of the paragraph says the area is closed to grazing, the 4th sentence of the paragraph says that grazing will be allowed under the restrictions as listed in impacts common to all alternatives. While this is not the preferred alternative and probably will not be in the final RMP it does add confusion to the intent of the draft. Also grazing closure would be inappropriate for the reasons cited above.

217-10

High Lakes ACEC calls for the closure of the Long Lake road. This closure should be seasonal, this would allow more people to enjoy the rock art, an open road at the site might deter vandals, it would connect two roads in an area where it would take a long time to drive around, adding convenience for users like hunters, it would allow the permittee to better manage the allotment.

217-11

The authority to allow permittees to use OHV's for permit administration needs to be retained, in all SMA's short of WSA status. Permittees are often small family businesses, and they need to be allowed to use the most efficient tool for the job.

WATER ISSUES

217-12

In cases where historic water development is deemed to be in conflict with management objectives the bureau should commit to the development of alternative water sources rather than just to eliminate the source. Wildlife as well as livestock would benefit from this policy.

217-13

Page 4-37 Statements here suggest that grazed areas do not capture, store, and release precipitation, this is incorrect and suggests a bias in the draft.

Figure 4-1 in Chapter 4 (West 1999) shows a sagebrush vegetation model containing various states of condition. According to this model, if certain thresholds of disturbance are passed, it is difficult to return to a previous or more desirable state. It may be more feasible or cheaper to maintain a sagebrush community in a mid- or late-seral state than to return an altered community to a previous state. The model demonstrates that it may be better to develop or maintain a functioning crested wheatgrass seeding than to allow a site to revert to an introduced annual grassland.

217-8: High Lakes ACEC is partially set aside for protection of cultural plants, which are productive and harvestable in the spring and early summer. At present there are no grazing conflicts, but if the season of use were to be changed, there would be a conflict. The low sagebrush plant communities and associate soils can not tolerate heavy grazing in the spring.

Grazing conflicts in the LRA have typically been addressed by fencing out (excluding) the affected areas or closing the area to grazing (for example, in Guano Creek where two rare plants were affected by trampling). In all the ACEC's containing grass community cells, monitoring would take place.

See also responses to comments 90-1, 114-3, and 197-2.

A change has been made in the text to be consistent with Alternative C, and it now states: *Livestock grazing would be allowed as described in Impacts Common to All Alternatives.*

217-9: In the Proposed RMP/Final EIS, High Lakes ACEC, Alternative C, the phrase *closing the area to livestock grazing* has been removed. Under Alternative D, the phrase *limiting livestock grazing* has been removed.

Grazing effects need to be monitored to determine if there is an impact. If a negative impact on the grass cells can be demonstrated, a change in grazing management or fencing would be proposed for those areas.

217-10: After further consideration, this road would be left open under the preferred alternative (Alternative D), along with increasing enforcement and education in hopes of keeping vehicles on the road and decreasing the amount of vandalism and disturbance to rock art sites (see Map SMA-16).

217-14

Page 4-43 the draft implies that juniper removal could change subsurface flow and increase the risk of erosion in the watershed. This is wrong, removal of juniper could increase subsurface flow, which over time will increase vegetation thus stabilizing the watershed.

217-15

Page 3-18 Alt D item 4 here the draft addresses grazing on 303d listed streams, it states that grazing will be allowed if there is no effect on restoring water quality. The draft should say that grazing will be allowed as long as progress toward the standard can be achieved. In the body of the text on 3-46 it is clear that this is the intended meaning. For example on a stream listed for temperature progress could be being made but one bite of shading vegetation could be construed as having an effect.

217-16

Page 4-52 the draft addresses acquisition of water rights for conversion to instream flows. In the arid basin the removal of water from agricultural production could conflict with local economic stability goals of the RMP. Water right acquisition should be considered on a case by case basis and not as a strategy in a long term plan.

GRAZING ISSUES

217-17

Page 3-68 the draft calls for a level of use that is below the active preference for the district, but is unclear how use is held below active preference. The rancher's current stewardship of their permits plays an unrecognized part in this process and the draft should reflect that.

217-18

Grazing plays an important role in managing fine fuels. Much money is saved every year in fire suppression efforts because of the fine fuels that are removed by grazing. As controlled burns are used more to achieve watershed goals, as the need to protect certain habitats from fire is required, the role of grazing in fine fuel management will be expanded, the draft should reflect this.

Page 3-68 has language that allows for a rest for less than two growing seasons after a fire. This gives managers important flexibility. This language should be kept intact in the final RMP.

217-19

Page 4-5 Table Alt A This table shows rest rotation to be markedly superior to deferred rotation when considering impacts to key species. This is too broad a statement to support, grazing prescriptions can be done that would allow for species composition improvement on a deferred rotation system. This type of management should be done on an AMP level.

217-20

Page 4-4 Table 4-1 the table only addresses long duration Spring/summer grazing Short duration (<30 days) grazing would not have the negative impacts described in the table.

217-11: The Off-Highway Vehicle section in Chapter 3 identifies limitations and criteria upon which administrative vehicle use in SMA's would be considered on a case-by-case basis.

217-12: Wildlife can benefit from man-made water sources on the landscape. However, changing the distribution of water sources on the landscape can have negative impacts to wildlife as well. All water developments should carefully consider and weigh all of the potential positive and negative impacts. If alternative water sources exist that are feasible and cost-effective, the BLM would consider these on a case-by-case basis.

217-13: While other managed areas may capture, store, and release water at a natural rate, the purpose of this paragraph is to describe effects common to all alternatives, including relatively unused lands. It is not intended to describe effects from grazing. Not all management and uses, including grazing, cause a negative or measurable change in the rate of capture, amount of storage, and rate of release of water in a watershed. The text was changed to clarify this point.

217-14: This section was not intended to describe the long-term effects of juniper removal, but rather the possible effects of improper treatment or harvesting practices. Because this is not a specific small-scale impact analysis, the risk of compaction is considered greater with greater amount of management. With the implementation of BMP's, this risk would be reduced and there would be long-term benefits. The text was changed to clarify this point.

217-15: The text has been changed to reflect your concern.

217-16: The importance of water rights to agriculture is without question, as is the importance of water in streams to provide fish habitat and passage. Water right acquisition would be considered on a case-by-case basis with a willing seller/landowner. It is appropriate to state this as a management option in the RMP.

217-17: The text in Chapter 3, under the Management Common to All Alternatives section, identifies various levels of grazing use based on a 10-year average of authorized use. In any given year, livestock permittees have the option of licensing up to their total active preference rather than just the average authorized use. We have added analysis to Chapter 4 that considers the permittee's option of using up to 164,128 AUM's, the full active preference for all permittees, in Alternatives A and D, and licensing up to 10 percent above the preference, or 180,540 AUM's, in Alternative B.

217-18: It is recognized that livestock grazing reduces fine fuel loads. The reduction in fine fuel loads due to grazing would not be a major factor in determining grazing management. Livestock grazing has been used by the BLM to reinforce prescribed fire control lines to reduce risk of escape in certain situations.

217-19: Table 4-1, Alternative B, has been modified to reflect your concern.

217-20: The definition of spring/summer grazing is discussed in Appendix E5 and states that the system involves grazing between May 1 and August 31. Therefore, by definition, there is no short-term grazing (30 days) that could be defined as spring/summer.

RECEIVED

JAN 31 2002

LAKEVIEW, B.L.M.

28 January 2002

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

The following are my comments on the Draft Lakeview Resource Management Plan (RMP) Environmental Impact Statement(EIS).

General Comments

218-1 | An integral part of an EIS is an adequate description of the Affected Environment which gives the reader a "baseline" upon which to judge the environmental consequences of the various alternatives. In my opinion, the Affected Environment section of the Lakeview RMP/EIS is not adequate and may not be in conformance with the National Environmental Policy Act (NEPA). The major inadequacy is that the condition of the vast majority of acreage in the planning area is either: (a) not stated or (b) conflicting information is presented. A more detailed discussion of this subject is contained in the Specific Comments section of this letter.

218-2 | Several places in the RMP/EIS, there is reference to Interior Columbia Basin Ecosystem Management Project (ICBEMP) publications. To my knowledge, the proposed decision for ICBEMP has not been finalized, therefore, it is not appropriate to include anything that would have resulted, if the proposed decision/ appeal process had been completed.

218-3 | The discussion of ACEC's reads as if the inclusion of this subject is just a perfunctory step i.e. the decision has already been made and is being formalized the RMP/EIS. Is my perception correct?

218-4 | The glossary contains a good definition of "road" and the additional description of the words used in the definition. Previous agency definitions of "road" had used the same basic definition, however, they failed to explain what was meant by terms such as "improved and maintained", "mechanical means" and "regular and customary use".

218-1: Please see response to comment 243-4.

218-2: The proposed decision for ICBEMP has not been signed. While we may not be required to incorporate standards, guidelines, and specific proposed actions from the ICBEMP proposed decision, it is appropriate to reference or incorporate the applicable scientific findings from the ICBEMP process. This was done through the subbasin review process detailed in Appendix A of the Draft RMP/EIS. The discussion of compliance with the ICBEMP process has been removed from Chapter 1 and has been substantially revised in Appendix B.

218-3: The process of ACEC evaluation is explained in Appendix I. Table I-1 also lists those areas that were nominated for designation as ACEC's, but through the evaluation process were found to not meet the criteria. Alternative D proposes designation of those areas found to meet the criteria. ACEC's are managed according to individual management direction developed by BLM staff and are not managed the same as WSA's.

218-4: Comment noted.

L-218

218-5

page S-1 The RMP/EIS states: "The integrated scientific assessment, the supplemental Draft EIS, and the proposed record of decision from ICBEMP were considered, and where appropriate incorporated throughout this document". It is not appropriate to include any information from ICBEMP's proposed decision, because that decision has never been finalized.

page 1-1 The RMP/EIS states: "When the record of decision is issued for the ICBEMP Final EIS....". This wording assumes that the record of decision will be issued, which with each passing day becomes less and less likely.

page 1-4 and A-2

218-6

A question posed on both of these pages is: "What is the current condition of various ecosystems and plant communities in the resource area and how can their conditions be improved or maintained?"

The RMP/EIS does not give an adequate answer to this question. The answers given are: (1) by referencing the integrity ratings which were created and applied by ICBEMP (see further comments on ICBEMP integrity ratings on page 2-46) and (2) vague sometimes conflicting statements such as on page A-8 it says that "rangelands are generally in an acceptable condition", then on page 4-61 it states "has left much of the remaining big sagebrush habitat in moderate to low ecological condition" and on page A-245 it states: "It (17339 acres in the Hawksie Walksie Potential ACEC) includes representation of excellent condition big sagebrush grasslands". There are many sources of information which could be used to give the reader at least some indication of current vegetation condition and trend in most of the planning area. Some of these sources are: (1) Table 2-26 (p.2-41-44) shows that at least 35 allotments (covering about 35% of the public land acreage) were evaluated in the 1990's. These evaluations must have included conclusions as to condition/trend. (2) In those allotments which were not formally evaluated in the 1990's, trend plots and photo stations were established in nearly all of the 1 and M allotments in the 1960's and 1970's. This information could be used to give some indication of trend and (3) page 2-40 says that over 800,000 acres has been assessed using the standards and guidelines (S&G's). Again, this information must have included conclusions as to condition/trend.

218-5: See response to comment 218-2.

218-6: The BLM is in the process of assessing on-the-ground conditions and impacts of grazing through the rangeland health assessment process (USDI-BLM 1997a). Table 2-28a contains a summary of the assessments for rangeland health and grazing management guidelines completed in the planning area. The assessments completed represent 49 percent (or 1,469,959 acres) of the planning area. The objective of the rangeland health regulations 43 CFR 4180 are to promote healthy sustainable rangelands, accelerate restoration, and improve public rangelands to properly functioning condition. The five standards are the basis for assessing and monitoring range condition and trend. Also see response to comment 243-4.

General Comments

218-7 This chapter should describe the existing situation with regard to playas/lakebeds. As the RMP/EIS is presently written, this subject is discussed in detail in Chapter 4 (Environmental Consequences) without any baseline data having been presented in Chapter 2.

Specific Comments

page 2-5 Table 2-1

218-8 The inclusion of a "Modified Grassland" vegetation class is not appropriate. It is unreasonable to include annual grass types (cheatgrass) and perennial grassland types (introduced wheatgrass seedlings) in the same category i.e. "Modified Grassland". There is no historic precedent for this vegetation class. Therefore, cheatgrass and introduced wheatgrasses types should be listed and described separately, rather than combining them because they are both dominated by introduced species. The acreage (249,140) of the "Modified Grassland" appears to be high, if the reader accepts statements on page 2-45 and A-8 which state respectively: "nonnative seedlings encompass approximately 67,000 acres and "There are no large areas (000's of acres) dominated by annual grasses.

page 2-7

"Brush/ clearing heading- this "class" is not shown on Table 2-1 and most likely this acreage is already included in the "Modified Grassland " class.

218-9 Typo -"scrub" instead of "shrub"

218-10 The RMP/EIS states: "Extensive grasslands in southeastern Oregon that formerly were composed of native bunchgrasses...." There is no evidence to support that there ever was extensive native bunchgrass grasslands in southeastern Oregon. If there is evidence, please site a scientific source. Nearly all of the seeded areas were previously in the big sagebrush or low sagebrush vegetation class.

218-7: Appendix H contains a section pertaining to the current situation of playas and lakebeds on the resource area and is referenced in the Wildlife and Wildlife Habitat section of Chapter 2.

218-8: The term *modified grassland* vegetation class is defined in the "Oregon Gap Analysis Project, A Geographic Approach to Planning for Biological Diversity," (ONHP 1999). The term is used for ecosystem analysis in Oregon by most land management planners and was used in the analysis for the ICBEMP. The 67,000-acre figure given in Chapter 2 was incorrect and has been changed to 249,140 acres. The text in Appendix A is incorrect.

218-9: This has been corrected in the text.

218-10: Evidence for native bunchgrass steppe in southeastern Oregon before European contact (and the introduction of horses, sheep, and cattle, and fire suppression activities) is found in scientific studies, explorers' diaries, and other sources, including Gruel (1985), Grayson (1993), Hansen (1947) and Schmitt (1956).

The proportion of grasslands to shrublands has changed over time. When fire (both natural wildfire and fires set by Native Americans) was allowed to burn naturally, there was a mosaic of grass and few shrubs. The cattle range that had been described as a "... limitless, waving field of bunchgrass, two feet high..." became crowded with shrubs due to grazing's removing competition from grasses.

218-11

The RMP/EIS states: "The large expanses of cheatgrass....." This statement is correct for some places in southeast Oregon (parts of Malheur county), however, it is not correct for the RMP/EIS area. The statement is contradicted on page A-8 of the RMP/EIS where it states: "the presence of cheatgrass is limited to a few isolated areas" and "there are no large areas (000's of acres) which are dominated by noxious weeds or annual grasses".

218-12

The RMP/EIS states: "In the past, many acres were planted with crested wheatgrass after wildland fires". This statement oversimplifies the situation. Probably most of the seedings were completed after wildfires, however, some of the seedings were the result of other methods of sagebrush control i.e. chemical, mechanical, or insect infestation.

218-13

The RMP/EIS states: "These communities remain a dominant crested wheatgrass community for about 10 years, when sagebrush and rabbitbrush invade". Again, an overly broad generalization. Several seedings have not had significant brush invasion for 20-30 years.

218-14

page 2-8-11 Riparian Vegetation- Have assessments been completed for the proper functioning condition of lentic waters? If not, it should be so stated. The existing narrative on lentic waters describes the criteria for determination of functionality, however, it is silent on the implementation of these criteria on any specific site.

218-15

page 2-31 The RMP/EIS states: "For example, wet meadows are converting to dry meadows as a result of lowering water tables caused by irrigation pumping and surface water diversions". Does this statement apply to lands administered by BLM? Most likely the answer to the previous question is no. If the answer is no, even though the quoted statement is correct for some wet meadows on private land, BLM has no authority on these lands.

218-16

The Wildlife section of the RMP/EIS does not discuss introduced birds- partridges, pheasants and quail. These birds have high public interest with many public land users.

218-11: A total of 78,620 acres in the LRA are classified as one type or another of cheatgrass community. In the gap analysis project analysis/ecological site inventory maps, there are several areas that show large expanses of cheatgrass. These are located in the Christmas Valley area, east of Crump Lake, and the Paisley Desert, Dry Valley, and area west of Lake Abert. Many of these areas are the result of previous wildfire burns; some have resulted from failed seedings and prescription burns.

218-12: Crested wheatgrass has been planted in the LRA after wildland fires (the largest percentage), sagebrush control projects, (including mechanical or chemical), Aroga moth infestations, and other disturbances.

218-13: This has been changed in the text.

218-14: Lentic proper functioning condition assessment has been completed on 126,000 (93 percent) of the 135,000 acres of wetlands, including playa lakebeds, occurring throughout the resource area (as shown in Appendix H-2). There were approximately 200 acres rated as functioning-at-risk with a downward trend and 100 acres rated as nonfunctioning. The factor that caused these ratings was dewatering due to gullying and head-cutting. These problems will be analyzed further when feasibility studies are conducted on playa/lakebed restoration potential (management action 6, Alternatives C and D under Riparian Restoration).

218-15: The intent of this statement is to explain overall watershed conditions in the planning area (regardless of ownership) and to partially explain the loss of habitat conditions and wildlife populations. Wildlife move from critical areas on private land to BLM-administered land; while the BLM has no authority over the management of the private lands, their management and condition do have an effect on the management of public lands. Also see response to comment 22-6.

218-16: The BLM recognizes that these birds are of high public interest.

Although these specific species were omitted from Table 2-24, management for these species is captured under Management Goal 3 in the Wildlife and Wildlife Habitat section of Chapter 3. These species have been added to Table 2-24 in the Proposed RMP/Final EIS.

218-17

Several creeks are listed which contain private stream miles. Does BLM have agreements with private land owners to manage these lands? If not, they either should not be shown in the table or shown with an appropriate footnote.

218-18

Table 2-26 page 2-41-44
It would be helpful to include a column in this Table which indicates the results of the assessments of the S&G's in specific allotments.

218-19

page 2-45 The RMP/EIS states: "The original objective of rangeland seeding with nonnative species was to increase livestock forage".

The preceding statement is a partial truth. It is either said: (a) in ignorance or (b) as an attempt to revise history. Of course, one of the objectives of the seeding was to increase livestock forage, however the quoted statement conveniently ignores the other reasons for seeding with nonnative species. Some of these other reasons were: (1) reduction of erosion and soil loss (2) decreasing the likelihood of annuals taking over the site (3) forage and/or cover for wildlife (4) the very limited availability and/or extremely high cost of native species seed and (5) the drought resistant traits of introduced wheatgrasses, thus increasing the chances of establishing and maintaining a viable stand of perennial grass. These type objectives can be found in specific project files.

218-20

page 2-46 The RMP/EIS states: "ICBEMP assessed the rangeland integrity of all subbasins in the project area". The preceding statement is correct, however, in ICBEMP's Eastside EIS (pages 2-226,227 and 239), it says the following about their ecological (rangeland) integrity process: (1) there is no precise definition of ecological integrity (2) there are no direct measures of ecological integrity (3) assessing ecological integrity requires comparison against clearly stated goals and objectives and (4) the process is not strictly scientific because it must be grounded in desired outcomes i.e. objectives and goals. To summarize, ICBEMP created a totally subjective, non peer reviewed method, then applied the method sitting behind a desk. The accuracy of ICBEMP's rangeland integrity rating process was tested in the Lakeview Resource Area. The process failed the test in over 1/2 of the resource area, apparently because road densities were over estimated, areas dominated by weeds or cheatgrass were over estimated, areas of potential agriculture were over estimated, and fire frequency has decreased instead of increased. So, how can it be explained that ICBEMP classified the majority of rangelands in the Lakeview RMP/EIS as having low rangeland integrity? A few of the obvious answers are: (1) looking at satellite images in Walla Walla does not necessarily result in accurate data as to what is on the ground (2) ICBEMP's refusal to consider agency collected data (ecological status, trend information, etc.) which would have given some actual data as to the integrity (condition) of specific areas and probably most importantly (3) the lack of opportunity for district BLM and USFS personnel to review ICBEMP documents before they were released to the public.

218-17: There are informal agreements with land owners for the management of the private reaches. These reaches are usually small, private segments intermingled with BLM-administered land. The purpose of listing the private miles is to show the cooperation between the BLM and private landowners on riparian management and to indicate stream condition on these reaches of coordinated management.

218-18: Table 2-28a, a summary of the assessments for rangeland health and grazing management guidelines completed in the planning area since 1998, has been added to Chapter 2 of the Proposed RMP/Final EIS.

218-19: The text for the objectives of seeding with nonnative seed will be modified in Chapter 2.

218-20: The ICBEMP ecological ratings of the four subbasins wholly or partially within the resource area were provided for general reference purposes. You are correct in that certain parameters dealing with rangeland integrity were overestimated. However, one of the purposes of the subbasin review process was to verify the accuracy of the ICBEMP scientific findings at the subbasin scale (see Appendix A of the Draft RMP/EIS).

218-21 | page 2-48 What were the results or conclusions of the wild horse fertility control study?

Table 2-30 page 2-50

218-22 | This table would be more understandable, if 2 additional footnotes were added: (1) annual horse numbers which were obtained by inventory and (2) annual horse numbers which were estimated.

Chapter 3 Management Alternatives

General Comments

It is refreshing to see a rather broad range of alternatives in the RMP/EIS i.e. the inclusion of a “production”, increased commodity use alternative. Several recent agency RMP/EIS’s (ICBEMP, for example) did not include a similar alternative. Even though it is unlikely that little (if any) of the “production” alternative will be selected in the proposed decision, it does serve an important purpose i. e. to analyze all reasonable approaches.

The description of the alternatives should specifically address whether a particular alternative allows plays and lakebed developments.

As presently written, the Alternatives for ACEC’s are primarily an “all or none” situation i.e. Alternatives A and E designate no new ACEC’s, Alternative B designates one specific area and Alternatives C and D each designate 12 areas with over 120,000 acres. It would seem that under Alternative A, a more middle ground could be analyzed i.e. designation of about half of the highest priority ACEC’s. This would be appropriate under Alternative A because as the RMP/EIS says on page 2-49, four ACEC’s (165,000 acres) were previously designated without amending the land use plan.

218-23

Specific Comments

218-24 | page 3-45 The RMP/EIS says that Alternative B emphasizes commodity production. If that is the case, why are water developments in playas/lakebeds more restricted in Alternative B than in Alternative A (no action)?

218-21: The fertility control study conducted by the University of Minnesota indicated that gelding the dominant studs within the herd did not affect foaling rates. The current research on the drug porcine zona pellucidae (PZP) has resulted in several modifications and improvements of the vaccine. The vaccine has not yet been approved by the Food and Drug Administration for general use. The first treatment of mares in the LRA was in January 2002. Mares that were in foal at the time of treatment are not expected to be impacted from the treatment. The first results on mares in the Beaty Butte Herd Management Area will not be known until the 2003 foal crop is produced.

218-22: The table has been modified to show years that horse numbers were estimated; data has also been added for 2000–2001.

218-23: This statement is incorrect. Two existing ACEC’s were designated in the “High Desert Management Framework Plan” (Devils Garden and Lost Forest/Sand Dunes/Fossil Lake). Two others (Warner Wetlands and Lake Abert) were designated through plan amendments. Additional ACEC’s cannot be designated without going through the land use planning process.

218-24: Alternatives A and B are the same for water development in intact playas and lakebeds. Development is only allowed if it does not negatively impact threatened or endangered wildlife or plant species. We inadvertently omitted the threatened or endangered stipulation for Alternative A. We have not developed any intact playas or lakebeds on the resource area for 15 years.

General Comments

218-25

In this chapter, the lack of existing vegetation condition information in Chapter 2 is very apparent. When vegetation impacts are described for each of the alternatives, primarily vague statements are made concerning the vegetative impact of each alternative. If more specific statements had been made in Chapter 2, then more specific statements could be made in Chapter 4 which would give the reader a better opportunity to compare the impacts of the various alternatives.

218-25: The ecological site inventory data which describes vegetation condition is still being compiled for the northern one-third of the resource area. Therefore, condition data is currently available for many allotments, but not all. See also response to comment number 216-1. Vegetation impacts for site-specific projects would be evaluated in the future during the project-level NEPA analysis process. Ecological site inventory and other information would be used in such analyses.

Specific Comments

218-26

page 4-13- Where is Figure 4-1? "Depauperate"- either define this erudite term in the glossary or preferably say "limited understory".

The discussion of "states" and "pathways" is incomplete. The reader is not told how any of the percentages for the various "states" were calculated. The narrative implies that the percentages were developed from existing condition information which is not stated in the RMP/EIS (see further comments on pages 1-4 and A-2). The percentage figures in the last paragraph of the first column ("The remaining 60%....") are highly questionable and in some cases in conflict with other statements made in the RMP/EIS. A more detailed discussion of these figures follows:

The RMP/EIS states that 19% of sagebrush steppe is desertified, "which constitutes brush with only introduced annuals in the understory". Using the acreage figures from page 2-5, this would mean that over 500,000 acres has only introduced annuals as an understory- a figure which is extremely difficult to believe and is directly contradicted on page A-8 which states: "There are no large areas (000's of acres) dominated by noxious weeds or annual grasses".

The RMP/EIS states that 15% of the sagebrush steppe is "introduced wheatgrass and ryegrass seedings". Again, using the acreage figures from page 2-5, this would mean over 400,000 acres are seeded- page 2-45 says "nonnative seedings encompass approximately 67,000 acres ??

The RMP/EIS states that 25% of the area is "introduced grass pasture with shrub reinvasion". If the reader accepts this as written, it means 40% (15%+25%) of the sagebrush steppe has been seeded with introduced grasses. This is not correct!! See previous comments identifying other places in the document which address the amount of area seeded.

From my perspective, the entire discussion of "vegetation pathways and states" should either be: (1) removed from the document or (2) substantially revised and expanded.

218-26: The word *depauperate* has been eliminated and *limited or bare understory* has been substituted. This section of the document has been revised. See Plant Communities, Shrub Steppe, Secondary, Indirect, and Cumulative Impacts section in Chapter 4 of the Proposed RMP/Final EIS.

Neil West (1999) developed a model (refer to Figure 4-1) including disturbance regimes intrinsic to the Great Basin sagebrush steppe ecosystem. This figure was intended to be included in the draft, but was inadvertently omitted.

218-27

In describing the impacts of each action alternative (B,C,D), reference is made to the implementation of Best Management Practices (BMP's) which are specified in Appendix D. This appendix includes very few specific BMP's for any activity except "Road Design and Maintenance". The "Livestock Grazing Management" section of the BMP's says that BMP's "have been standardized over time". If they are standardized, what are they? What are the Best Management Practices for Riparian/Wetland sites? In affect, what the reader is being told is "trust us, we will do what is best". Personally, I tend to agree with this philosophy because, hopefully that is what BLM is paid to do. However, in my opinion, the inclusion of vague or nonexistent Best Management Practices (as presently written) raises more questions than it answers.

218-28

page 4-16 The RMP/EIS states: "Lakebed development could change the water regimes onsite or allow water to be transported offsite, thus negatively affecting wetland vegetation". Of course, lakebed development will change the onsite water regime, however, in almost all cases, it will NOT allow water to be transported offsite because there is nowhere it can be transported i.e. by definition, the lakebeds (playas) are self-contained watersheds.

218-29

The RMP/EIS states: "Lakebed pit construction can penetrate the restricting layer in the lake and result in the loss of the water-holding capacity of the lake". The facts do not support this gloom and doom opinion. Construction techniques can (and have) avoided the worst case scenario which is quoted above i.e. the loss of the water holding capacity of the lake. A couple of these construction techniques are: (1) if a restricting layer is encountered, excavation can be stopped or (2) a practice which was successfully used in dozens (or hundreds) of lakebed excavations was to place a few inches of lakebed topsoil in the bottom of the pit. Whatever construction practice was used, with rare exception, the fact is: with all of the existing pits hold water and the water holding capacity of the playa was NOT lost, the result was a perennial source of water for all animals, often in an area which previously had available water for only a couple of months in the spring.

218-30

page 4-17 The RMP/EIS states: "Allowing playa and lakebed developments could degrade the current proper functioning condition of wetlands and would have a negative impact to wetland conditions". The previous statement assumes that all playas/lakebeds are wetlands, which is not necessarily true. In addition to the soil characteristics mentioned in the glossary (page 6-13), any reasonable definition of a wetland needs to contain vegetation characteristics. Somewhere in the RMP/EIS, there should be a brief description of the vegetative components of a lotic and lentic wetland. From my personal knowledge, in nearly all playas/lakebeds (where pits were excavated in the 1960's and 70's), prior to construction, no vegetation existed in the lowest part of the lakebed i.e. the area was "slick". This fact should be available in many individual project files where there are "before" and "after" photos. No, the area was not "slick" due to excessive grazing. Prior to pit excavation, the areas had not been grazed (except very lightly in early spring) since sheep had been the major class of livestock in the High Desert areas of Lake and Harney

218-27: BMP's for grazing management have been added to Appendix D of the final plan.

218-28: Intact playas and lakebeds are self-contained watersheds when functioning properly.

218-29: Most, but not all, of the playa and lakebed pit developments on the resource area hold water, but there have been some that have required several applications of bentonite clay along the bottom to form a seal. A few others still do not hold water. It is true that wildlife benefit from more perennial sources of water; however, the smaller area of ponded water created in the middle of the lakebed/playa causes the loss of critical forbs found around the larger natural intact playas and lakebeds as the water recedes. This negatively impacts greater sage-grouse and pronghorn populations.

218-30: The BLM agrees that all playas and lakebeds are not wetlands. We conducted lentic proper functioning condition on all palustrine and lacustrine wetlands contained on the USFWS's National Wetland Inventory maps. Some of the wetlands mapped in the inventory were playas and lakebeds that marginally fit the wetland definition. We completed the assessments on these marginal wetlands, however, to comply with the proper functioning condition directive. The lowest portion of the lakebeds were probably unvegetated prior to pit construction due to deeper water standing longer than on the shallower margins; however, we have documented a reduction of critical forbs over the entire surface of lakebeds after concentrating the majority of the water in a central pit. In a natural, intact playa, the forbs follow the waterline down to the lowest point during natural evaporation. Livestock concentrate on these areas and feed on what forbs are available after pit development.

counties If my memory is correct, the last of the sheep operations which switched to cattle was in the mid to late 1950's. Therefore, when the pits were dug in the 1960's and 70's, the areas within a few miles of each playa had received only occasional light grazing by any large animal for 10 years or more.

218-31

page 4-42 The RMP/EIS states: "Not allowing new water developments in intact playas and lakebeds". This decision is not mentioned on the description of Alternative D on page 3-46. In addition, in Chapter 2 (page 2-10), all that is in the narrative is a description of the geographic setting of these lakebeds/playas. To summarize, the reader is given no rationale or background data to support the decision stated on page 4-42.

218-31: The description of not allowing new developments in intact playas and lakebeds has been inserted into the text.

Summary comments on lakebeds/playas/wetlands and ACEC's

The Clinton/Babbitt/Dombeck era of preservationist oriented environmental policies is history. The current administration has recently announced more practical, common sense approaches to the wetland subject. Like it or not, more rollbacks of Clinton/Babbitt/Dombeck policies will occur in the future.

Appendix

General Comment

A few sections of the Appendix contain either a discussion of the Affected Environment (Chapter 2) or the impacts of the various alternatives (Chapter 4). These narratives should not be buried in the Appendix, they should be included in the appropriate chapter of the RMP/EIS. The most obvious sections which should be moved are: (1) Appendix E2 which is even titled "Livestock Grazing Impacts to Vegetation Communities" and (2) several portions of Appendix H2 (Wildlife and Wildlife Habitats).

218-32

218-32: Appendices may be appropriately used for detailed discussions or analyses that are too bulky or contain more information than is needed for the main text. In this instance, the material from the appendix is summarized in the main text, and the reader is referred to the appendix for more detailed discussion.

Specific Comments

Page A-224 The RMP/EIS states: "the development of pits and reservoirs in natural lakebeds ... has caused a MAJOR (emphasis added) shift in forb distribution, density, and availability". This unsubstantiated opinion is not supported by the facts. As commented previously, there is photographic evidence to prove that the majority of these lakebeds (where pits were excavated) had NO vegetation (grasses, forbs or shrubs) in the location where the pits were constructed.

218-33

218-33: Please see response to comment 218-30.

218-33

The RMP/EIS further states: "Some pits have also broken the playa seal and water is completely lost from the lakebed system". How many is some? Preferably say, about ___% of the lakebed pit excavations have resulted in the loss of water holding of a specific lakebed system. My estimate of that percentage is in the range of 1-5%. When an actual percentage figure is included, then the reader can readily see that excavated pits which resulted in loss of water holding capacity are a rare exception, and NOT the common occurrence implied by the opinion quoted above.

Page A-224

218-34

The three paragraphs describing acreage and condition of wetlands should be in the Riparian section of the Affected Environment Chapter (page 2-11). The RMP/EIS presently includes a table (2-3) which indicates stream condition, why not wetland condition? Do the 135,000 acres of wetlands include the "desert" playa/lakebeds?

218-34: Appendix H, Wildlife and Wildlife Habitat, Priority Habitats section contains a discussion of the current situation of playas and lakebeds on the resource area and proper functioning condition ratings for the 125,000 acres surveyed. This section is referenced in Chapter 2.

218-35

The initial 3-4 pages of Appendix H2 includes many descriptions of the affected environment. On the subject of lakebed pit developments, an elementary, obvious fact is conveniently omitted i.e. that the successful pit excavations resulted in a perennial source of water for all wildlife species in an area where previously water was available, at most, for only 2-3 months in the spring.

218-35: Please see response to comment 218-29.

Finally, a couple of apparent typos in the Appendix

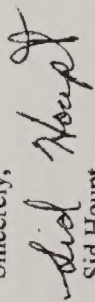
218-36

Page A-179 - 25,000 acres of juniper removal in Crump allotment, page 2-41 says that the entire allotment has only 2,930 acres of public land?

218-36: The number shown in Table E3-1 is incorrect and has been changed to 2,500 acres.

Page A-245 Idaho wheatgrass?

Sincerely,



Sid Houpt
103 Park West Drive
Pullman, WA 99163

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC10 Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes:

I have read your Draft Lakeview Resource Management Plan (RMP) and Environmental Impact Statement and submit the following comments for you to consider and act on. Any questions I raise in this letter should be specifically answered in the final document you put together. This draft document is very technical and written so that it narrows the group of people who can understand what is written. Even well educated people who are not familiar with scientific and government talk are at a disadvantage. Who are you writing the document for, the public or yourselves? Do you care if the public understands or not? Throughout the document it is hard to know exactly what management actions are part of the preferred alternative. You must make these documents easier for people to read and follow. I have had many people tell me that they got frustrated trying to read the proposed plan and simply quit.

I believe the Bureau of Land Management has done a good job of managing the federal land in Lake County, and from reading the document and trying to understand what it says, I support Alternative A. Don't change anything.

I do not support the designation of any new WSA's, ACEC's, RNA's, or Wild and Scenic Rivers. The document is not clear on why we need all of these special designations. You have not proven how all of these special designations will protect the resources over present laws and regulations you have that are currently in place.

You are proposing to close 411.8 miles of roads in proposed special management areas, but for the most part you do not present any specific reasons for these road closures. Reasons given for the proposed road closures are general in nature and do not provide sufficient justification for the majority of the closures. In the impacts section of the document you justify road closures because they will "reduce soil compaction and erosion." (page 4-91) Under some alternatives you say "limiting the OHV use to existing roads and trails would benefit both cultural and botanical values in the ACEC/RNA (page 4-92)." Why wouldn't limiting OHV use to existing roads and trails be sufficient to protect these cultural and botanical values in all instances? In your final document you must address each individual road closure and provide information that clearly proves closure will provide protection over and above the option of using the existing roads and trails designation. You appear to use closure over enforcement because it is easier for you to do.

219-1

219-1: The Proposed RMP/Final EIS has been revised in response to public, Tribal, other agency, and internal comments. The main text (Volume 1) and appendices (Volume 2) have been streamlined to the extent possible. The preferred Alternative D has been rewritten for clarity.

219-2

219-2: Refer to response to comments 189-1 and 223-4. No new WSA's are being designated. Approximately 1,200 acres of land adjoining three existing WSA's are being added (see Maps SMA-7, SMA-13, and SMA-16).

219-3

219-3: Based on public input, we have reevaluated proposed road closures and OHV designations. Refer to comment response 19-4. OHV designations and road closures under the preferred Alternative D were proposed in response to known problems relating to SMA's, critical or important plant or animal habitats, and cultural resources. Table 4-4 identifies the specific reason(s) for specific road closures. Road closures within WSA's were required to comply with the wilderness IMP (USDI-BLM 1995b) and are nondiscretionary.

In some cases, the only practical way to prevent vandalism of cultural sites or off-road use is to close a specific road. Some cultural sites are determined to be very fragile and are not appropriate for visitation. Implementing a road closure is much easier to enforce than monitoring larger areas for off-road use. The BLM must balance access and resource protection.

L-219

If a road is closed for public access does this mean it is closed to all users? Will special interest groups be able to use any closed roads for access? For example, will Native Americans be able to use a closed road to access cultural plants they want to harvest? Or, will they have access in to these areas only by foot? Will scientists be able to drive on closed roads in any RNAs? If so, why do they have preference over my use? For all proposed road closures (specific to individual roads proposed to be closed) please say exactly who and when any groups or individuals would be allowed to use these roads and why would they be allowed access when others would be denied the same opportunity? The majority of Lake County is owned by the government and I should have the same opportunity to use these lands that others would have.

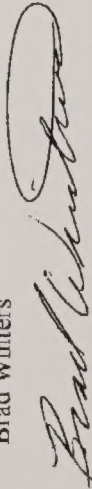
219-4

I support keeping the Sand Dunes open to OHV's and the Lost Forest should remain open to camping. If you should decide to close these areas I request that you do a detailed economic analysis on what the impacts would be to the communities in North Lake County. Visitors to these areas do have a significant impact on the economic well being of the communities of Silver Lake, Christmas Valley, Fort Rock, and Summer Lake.

Thank you for the opportunity to comment on this proposed plan. I am hopeful that you will do what is good for the residents Lake County.

Sincerely,

Brad Winters



Limitations on access to public lands through road closures or limited OHV designations would not apply to official use, any fire, military, emergency, or law enforcement vehicle when used for emergency purposes, any combat or combat support vehicle when used for national defense purposes, or any vehicle expressly authorized under a permit, lease, license, or contract. Individuals or groups that would be authorized to use roads and trails which are proposed for closure would be considered on a case-by-case basis and would only be authorized if the proposed use would be associated with a valid permit, lease, license, or contract. Refer to Chapter 3 for additional information.

219-4: The negative economic impacts to local tourism of closing the Sand Dunes area to OHV use are acknowledged in the draft and final plans. Chapter 4 has been edited to specifically name the communities that would be directly impacted.



Friends of Living Oregon Waters (FLOW)

P.O. Box 521, Ashland, OR 97520 • 541-482-2049 • flow@oregonwaters.org • www.oregonwaters.org

January 28, 2002

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10
Box 337
Lakeview, OR 97630

Dwayne:

FLOW uses legal and public education strategies to protect Oregon's rivers, watersheds, lakes, wetlands, and groundwater from the impacts of pollution and development.

Thank you for the opportunity to offer comments on the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Please consider these comments as the Lakeview BLM District Office prepares its final RMP/EIS for the Lakeview Resource Area.

Our comments are brief and will focus on management direction that could be considered in the FEIS. FLOW represents over 100 members throughout Oregon including members that use the Lakeview Resource Area.

1. FLOW advocates for the continued protection of Oregon's Wild and Scenic Rivers and closely monitors actions that may threaten the integrity of Wild and Scenic Rivers. FLOW also adamantly supports the designation of new Wild and Scenic Rivers. We support Alternative C's recommendation that Guano Creek be designated as a "wild" river and that Honey and Twelvemile Creek are also designated as National Wild and Scenic Rivers. Although its present management status does afford Guano Creek certain protections by law, designation as a "wild" river would provide a long-term level of protection.
2. Alternative D, the Preferred Alternative, should not be chosen. Alternative D does not reduce livestock grazing levels by a single Animal Unit Month (despite the RMP's acknowledgement that cattle grazing causes resource damage), and it leaves the overwhelming majority of the planning area open to destructive off-road vehicles. Environmental documentation exists within the Lakeview BLM planning process that exhibits notable resource degradation from cattle grazing and OHVs. The RMP is an excellent opportunity to withdraw lands from grazing and OHV use that are currently being negatively impacted.
3. FLOW supports the implementation of Alternative C. Alternative C adheres to "ecosystem management" objectives by excluding livestock from all riparian areas,

220-1

designating zero acres as "open" to cross-country off-road vehicle use, recommending all eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern and designating twelve new ACECs.

4. To reinvigorate plant communities consider the exclusive use of native seedlings. After reseeding, these areas should be allowed rest from grazing for a period of at least 5-10 years. Alternative C has provisions for the use of native seedlings while Alternative D contravenes Management Goal #2 with the use of nonnative plant species.

5. There should be an honest, unbiased assessment of resource damage from cattle grazing and how that impacts the management goal for riparian/wetland vegetation of "Restore, maintain, or improve vegetation, habitat diversity, and associated watershed function to achieve healthy and productive riparian areas and wetlands." We support the goals of Alternative C, to look at such issues from a watershed perspective and only allow activities if they have *no effect* on riparian conservation areas. FLOW supports the removal of all cows from riparian areas.

6. FLOW supports the management direction for water quality stated by Alternative C. A guiding principle should be "where State water quality standards are not being met due to management on BLM-administered land, allow only uses in the associated watershed that allow progress toward the attainment of State water quality standards."

7. FLOW supports BLM efforts to acquire water rights for conversion to instream use when such an opportunity exists.

8. Alternative C still includes far too high of a level of acceptable grazing use for the Resource Area. Administrative "solutions" to grazing impacts often do not go far enough to actual remedy the problems associated with impacts from cattle grazing. For the FEIS, consider an alternative that has far less grazing AUMs for the Resource Area and truly emphasizes restoration and protection of riparian areas.

9. FLOW supports Alternative C with respect to OHV activity. OHV activity constitutes a rapidly growing threat in the Lakeview Resource Area. All WSAs should have ORVs limited to existing roads. Furthermore, one alternative in the FEIS should consider closing more areas to OHV activity completely.

We look forward to the opportunity to comment of the Lakeview Resource Area FEIS/RMP when it becomes available. Please keep us on all mailing lists for projects within the area.

Thank you for the opportunity to comment.

Amy Serres

Amy Serres
Co-Director, FLOW
P.O. Box 521
Ashland, OR 97520

RECEIVED

JAN 31 2002
LAKEVIEW, B.L.M.

220-1: The use of native plant seeds is preferred on any rehabilitation project, but on drier sites (8 to 10 inch precipitation zone), the use of nonnative species is often necessary to establish some perennial vegetation initially to reduce erosion and limit the invasion of cheatgrass and noxious weeds. In some cases, there is also the problem with availability and cost of native seed material. As better native seed materials become more available and affordable, the nonnative seed will be used less. See also comment response 17-12.

Under the preferred Alternative D, there is a minimum rest of two growing seasons required following a seeding. A longer period of time would be required if the vegetation was not substantially established.

January 30, 2002

Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

To: RMP Team Leader, Dwayne Sykes

The following comments are submitted for your consideration for the Draft Lakeview Resource Impact Statement, October 2001.

I support Alternative D. My comments are directed toward recreational aspects, particularly OHV use. The plan indicates many significant changes negatively impacting OHV use throughout the district. Road and area closures, restrictions placed on OHV events, consideration of designated campgrounds in dispersed recreational areas to name a few.

I also have concerns that issues raised for consideration by your agency appear in contradiction of similar issues discussed in Wilderness Study Report volumes, October 1991. Specifically, the volumes document area usage, enforcement issues, and the designation of WSAs.

Further, I would like to be assured that mitigation efforts have been studied and considered for road closures and restrictions with the ACECs. I have traveled many of these roads and have not observed the same areas of concern that are documented. In many of these areas the number of visitors is extremely low.

The plan identifies "412 miles of roads in SMA's would be closed" under Alternative D, page S-10. Many of these roads are in the proposed ACECs. This seems premature given the number of areas already designated as WSAs. These decisions should be postponed until this has been finalized by Congressional and legislative action. It is adequate that, in the interim, access should be allowed for existing roads and trails throughout the district.

The plan acknowledges that where proposed such OHV restrictions will create other problems. In an area of this size, where dispersed use is one of the best tools, such restrictions seem premature. If you decide to designate the ACEC areas as proposed, leave access open to all existing roads and trails.

The draft proposes to "close and rehabilitate all roads on public lands not needed for private land access, permit administration, law enforcement, or fire protection," page 3-17. Though this specifies a case by case basis, this could impact a significant number of roads over the course of time.

Will these roads be opened once they've been rehabilitated? I suspect that is not likely. While you may consider such roads appropriate for such consideration, you should also consider that they enhance dispersed opportunities for exploration.

221-1: This statement refers to roads or trails that are serving no known purpose or are causing resource damage that may be identified during the life of the plan. During the 20-year span of the current land use plans, very few such roads were identified and closed. It is not likely that there will be a significant increase in such closures during the life of the Proposed RMP/Final EIS. A number of specific roads within SMA's have already been documented with resource damage problems and are proposed for closure for that reason. Also see response to comment 19-4.

A significant reason for many OHV users to visit your area is to explore the area. The activity is very different than the "recognized" uses of OHV. Exploring is most often family oriented and at low speeds. Not the sort of activity likely to destroy resources.

This is further identified on page 3-74, "Road Management." These areas should be kept open and restricted to existing roads and trails. Adequate resource protection can be maintained by the change in the districts designation of areas open and closed to OHV use. The ACECs noted in Table 3-3 should all be designated as "IE" and/or "O."

The Management Direction for the Lost Forest/Sand Dunes/Fossil Lake ACEC/RNA are extremely restrictive toward recreational use. Reducing the size of the area to 35,575 acres as noted on page 3-81 is going to create undesirable conditions in this area for users and cause additional resource damage. The existing boundaries should be maintained.

Do not enlarge the Fossil Lake area by 2,719 acres, page 3-82. This will have a significant negative impact on the Sand Dunes use area. This will overly restrict users to a smaller area creating more resource issues. This area has long been open. Erosion is an ongoing natural process that has far more impact than seasonal OHV use.

I am opposed to designated camping areas. The idea of rotating camping sites is absolutely ridiculous. This area is a primitive camping area where dispersed sites should be the norm. The whole proposal is counter to any reason a person would frequent the Sand Dunes.

Also eliminate the proposed designation of travel routes for the same reasons identified above. The Wilderness Study Report already describes enforcement problems that state the obvious - it's not practical nor monetarily feasible to enforce such restrictions. I'm also surprised to hear there are private lands within the Dunes. You should purchase them. The idea of establishing a campground on private property must be the idea of someone who wants to dump a problem in someone else's yard.

I think it's a mistake to propose a designated area for special recreation management. This will concentrate users and consequently resource management into a smaller area. How do you intend to manage this area given what changes will occur? This seems like someone's idea to see if they can move recreational uses to one specific area of the district so they'll alleviate problems in the rest of the area. Again this seems counter to the entire concept of dispersed use. The overall aim appears to funnel users to one area through a well orchestrated plan.

I've spent a lot of time in the Green Mountain area and the primary reason for going there besides to visit the Lookout Tower is the

221-1a

221-1a. Map SMA-9 shows three existing private parcels within the Lost Forest/Sand Dunes/Fossil Lake ACEC. Inholdings within SMA's are generally considered a higher priority for acquisition, but as noted in the Lands and Realty section of Chapter 3, this would be done with willing sellers only. The concept of having a private interest develop a camping area on private lands was included because of a known interest by an area landowner to develop such a site.

221-2

221-2: Proposed designation of a special recreation management area is in response to increasing concentrated recreational use, and both present and future needs are identified for intensive management to achieve recreation objectives. These objectives would include specific recreation activity opportunities and physical, social, and managerial settings for targeted recreation experiences. The foundation for proposed designation of a special recreation management area is not based on the desire to concentrate existing dispersed recreational uses.

rustic nature of the area. Your proposal to upgrade the campground to a developed site is out of context with the area. Again, this plan just does not seem well thought out. I suppose someone will next propose to pave the road to the tower?

221-3

On a side note, I'm very curious what a "non-motorized" OHV activity is as noted on page 3-113? Don't restrict camping on the Connelly Hills, this is a significant feature in the area with much history and little resource damage with low visitor use. And again don't designate three camping/staging areas in the Sand Dunes WSA, page 3-116. It won't be supported by the users, impossible to enforce, a waste of time, money, and personnel, and completely out of context for the area. There are some crowd problems at certain times of the year but this is not the way to manage the area or serve the desires of the public, and it will not in any way engender good will.

The draft is overly restrictive to OHV events, page 3-120 by limiting all events to exiting roads and trails. This is counter to the whole concept of "open." Why single out OHV events? The district does not permit many such events. Given the reduction in open areas by over 500,000 acres, adding this on top really raises the question of why? This should be event specific with full consideration to what is proposed and what issues it creates, and how it can be managed, as well as the level of acceptance and responsibility that will be assumed by the sponsors and participants. This is also identified on page 4-35, "...64 percent of the area would be open to crosscountry travel by OHV..." Actually this should lead to reduced compaction to the area now due to the increased area closed to OHV use?

Page 3-145 identifies an interesting situation, "...any roads that are causing significant resource damage..." Certainly I would place a moratorium on any road out there causing problems without authorization or permits.

The issue of noxious weeds is significant and needs to be approached carefully and without bias. I assume that one of the ways in which this plan addresses that concern is the increasing restriction of OHV to existing or designated roads and trails while reducing open areas, adding ACECs and their access restrictions. What studies have you conducted on seeds displacement on roads and trails compared to open areas? What studies have you conducted on OHV transport of seeds? The fact is, areas in which OHVs operate are relatively free of plants aren't they? (Also noted on page 4-33).

The draft really hits the mark on all these restrictions on page 4-9 in identifying the impacts to "more concentration of recreational activities" and "accumulated negative effects." The mitigation impact of closed roads is over estimated. Closing roads reduces the available base, further concentrating use and unless this involved a significant number of miles would not offset the negative impact of their closure. It's the extent of the roads and trails that keep the users dispersed.

221-4

Recreational uses within the north Lake County area have been steadily increasing over the last decade. These increases can be partially attributed to population increases in LaPine, Bend, and Redmond. After designation of a special recreation management area in this RMP process, a recreation area management plan (and associated NEPA document) would be developed. Management direction would focus on providing recreation opportunities to meet increased demand, reduce conflicts among users, minimize damage to resources, and reduce visitor health and safety problems. Major investments in facilities and visitor assistance are appropriate in a special recreation management area, whereas major investments in extensive recreation management areas are not appropriate. Public lands in the resource area which are not designated special recreation management areas are designated extensive recreation management areas.

221-3: Nonmotorized activities include mechanized and human-powered activities, such as mountain bikes and wind-powered devices. This point will be clarified in Chapter 3 of the Proposed RMP/Final EIS.

221-4: The BLM has not conducted any studies on weed seed "displacement" on roads and trails versus open areas or weed seed transport by OHV's. It is known that weed seed and plant parts stick to clothing, equipment, fur, feathers, and vehicles, and are transported to other areas. If vehicular travel is limited to existing roads and trails, the BLM is better able to monitor weed spread and establishment. The likelihood that weeds would colonize new areas is reduced by restricting off-road travel. Vehicles are able to travel long distances in a short amount of time and have many places where weed seed and plant parts can attach unobserved. The next time a vehicle is taken off the road, chances are high that the propagule would be deposited in an uninfested area. In light of this, BLM vehicles are washed on a regular basis, and the BLM requires all fire vehicles from outside the resource area to be washed prior to arriving at a fire.

I have traveled the roads throughout much of the Devils Gardens and around Cabin Lake. I have traveled up to the old homesteads as well and taken pictures of them over the years. The terrain is mostly flat with small rises, not the type of terrain that leads to road and resources damage that this plan seems to document. In fact, overall, my impression is that the vast majority of the damage is caused by year-round residents and not seasonal visitors. The roads should be left open to all users. In addition, the number of visitors in the Devils Gardens area, not the mention the other proposes ACECs is very small, again noted in the Wilderness Study Report. Cave damage is a concern and I support cave closures where appropriate but leave the roads and trails open.

Do not increase Fossil Lake by 9,379 acre, page 4-90. Damage by OHV use is very limited from my observations over the years and the vast majority of users concentrate their use to the dunes area and existing travel ways. I have on the other hand met locals who traverse many parts of the areas as well as unscrupulous users of all types.

I'm also concerned that there appears to be an effort, in some cases, to disrupt traffic flow by closing certain roads that continue through ACECs rather than deadend. As stated above, few, if any existing roads and trails should be closed. The draft contains few mitigating proposals other than closure, and closure is not mitigation.

The plan also proposes to upgrade the road into the Lost Forest. For many years this road was in very poor condition until recently being upgraded. As with other ideas in the plan, here is another poorly thought out concept. This area is a primitive area and should be managed as such. Users come to this area for that very reason. Upgrading this road will increase usage, eliminate the aspect of having to negotiate the road to get to the Lost Forest or Sand Dunes. The road is part of that experience. Considering that statement "part of the experience", this plan never mentions that that as I recall. As much effort should be expended to include that as a vital concept of why people come to your district.

Another thing I noticed on page 4-126 dealing with OHVs, the management goal does not contain any wording to the effect, "provide and enhance" as it does with other management goals, for instance on page 4-120, Recreation Resources, Management Goal? Given the reduction of the size proposed by this draft I don't see how this would occur anyway.

I'd like to think that there was enough recreation representation on the Interdisciplinary Team, but only noted two, Dan Hollenkamp, and Trish Lindaman. I also hope the references used for formulating this draft covered more than just the negative aspects but presently well-rounded data.

Overall, I'm concerned that there is a bias toward OHV users of all types and question whether this district can meet Issue 4 as

defined on page A-3. The combination of road closures (412 miles), reduction in open status (nearly 470,000 acres), the 12 additional ACECs, 8 of which total 120,350, plus the closures for wildlife, closures of open areas for OHV events, limiting of access in ACECs to designated roads and trails, limiting OHV use to exiting roads and trails on 275,465 acres in the northern end of the resource area, eliminating the concept of dispersed camping sites, and other changes create a clear picture of what the district really wants to not occur on public lands.

The draft doesn't seem to use the M (mitigation) word much, doesn't speak to experience desired by OHV users, and incorporates the paradigm shift in the definition for primitive areas and surroundings consistent with that concept. Like a lot of the things I've seen, the district doesn't really know what to do with OHV use and users but for whatever reason would like them to camp on private property in the dunes. The draft misses the entire issue of why anyone travels to the district for recreation. It certainly isn't to camp next to someone else in a developed campsite.

The use of the Interior Columbia Basin Ecosystem Management plan is highly controversial and one that should be applied sparingly or not at all. The draft also refers to the newest BLM OHV recreational study. The document plagiarizes the old Recreation 2000 documents to a tee. There is no new information. The really puzzling part is that it's as if this document never really existed.

For a short synopsis of my main points.

1. Don't reduce the Sand Dunes area by enlarging Fossil Lake
2. Don't create campsites on the dunes and do not eliminate dispersed camping.
3. Limit access to existing roads and trails or open and not to designated roads and trails.
4. Don't upgrade the road into the Lost Forest/Sand Dunes/Fossil Lake.
5. Don't upgrade the camping sites on Green Mountain.
6. Allow OHV events on open areas on a case by case basis.

The draft already proposes changes that impact OHV use on 1 million acres.

Steve Peterson
Steve Peterson
P.O. Box 653
Marcola, OR 97454
541-933-2026

31 January 2002
Sent via fax to: 541-947-6399

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

We are writing in regard to the Lakeview Resource Management Plan and ask you to **please choose a strengthened Alternative C**. As the human population increases, the need for wild and scenic rivers and healthy fish and wildlife habitat (including habitat for rapidly declining sage grouse populations) is increasingly important.

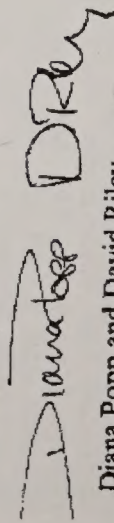
Alternative C addresses the careless and often deliberate destruction of fragile habitats by off-road vehicle users (which we've often witnessed), reduces livestock grazing which greatly impacts fragile desert soils, closes roads in Special Management Areas and ALL riparian areas (which are extremely fragile and important in the desert), excludes areas to energy and mineral extraction, and recommends Wild and Scenic River status for three streams, among other benefits.

Diana conducted field work on a ranch in which the ranch manager had for years allowed only minimal, seasonal grazing in the riparian area. It was a lush, green ribbon in the desert, full of clean water and a multitude of wildlife. The adjoining ranch allowed the cows to plow through its stream, devouring all vegetation. It was a muddy, rutted gully. There was no comparison between the two streams.

Please take the long view of the survival of fragile desert habitats, and by extension, all the wildlife and people who enjoy and depend upon it. Please choose a strengthened Alternative C.

Thank you for your interest.

Sincerely,



Diana Popp and David Riley
59970 Edmonton Drive
Bend, OR 97702



LAKE COUNTY BOARD OF COMMISSIONERS
513 Center Street
Lakeview, Oregon 97630
(541) 947-6004
FAX: (541) 947-6015

Bradley J. Winters, Chairman
William D. Barry, Jane O'Keeffe

January 29, 2002

Bureau of Land Management
Lakeview District
Highway 395 South
Lakeview, OR 97630

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JAN 31 2002

RE: Comments on Draft Lakeview RMP/EIS

To Whom It May Concern:

The Lake County Commissioners wish to express our appreciation for the briefings we have received during the course of the development of the draft Resource Management Plan for the Lakeview Resource Area of the Bureau of Land Management.

223-1

The Lake County Commission on August 19, 1992 adopted Lake County Ordinance No. 24, an Interim Public Land Management Plan. Section 7.3 of this Ordinance states that "No additional wilderness, roadless or research natural areas shall be designated in Lake County".

We believe the proposed designation of 12 new Areas of Critical Environmental Concern, ACEC's, 10 of which will be Research Natural Areas, RNA's, and adding 1,194 acres to 3 existing Wilderness Study Areas, WSA's, is contrary to the provisions of Lake County Ordinance No. 24.

In addition, we believe the intent of the Lake County Commissioners in 1992 was to prohibit the designation of new "special management areas". Therefore we also object to the designation of ACEC's and Wild and Scenic Rivers.

Lake County feels strongly that the current management of the Bureau of Land Management is very effective. Many of the results of the current management strategies are just becoming apparent. Therefore, Lake County supports the no action alternative "A" with a few changes.

The new RMP needs to incorporate the current grazing program and standards. The current rangeland conditions are at least stable and in most instances are showing improved condition. We believe the current program will continue to show the desired result. Riparian conditions are

223-1: Please see response to comment 22-2.

L-223

showing improving trends as well. Again, we attribute this trend to the current management. Management changes in the area of natural resources do not usually show rapid results. Changes from the last 5 years or more are just now beginning to show results. However, the results are now measurable and the direction is positive.

We recommend implementation of the Interim Sage Grouse Management Guidelines as part of the RMP. Those guidelines along with adequate funding will address the Sage Grouse issue. We believe more study of Sage Grouse habitat needs is necessary. It's hard to understand why Sage Grouse flourished in the 1930's, 40's, 50's and 60's while grazing use from first sheep then transitioning to cattle was higher than today. We wonder if the predator control by sheep herders may have been the key to the high population of Sage Grouse during that period? It may be that the natural sustainable population is much less than is being managed for.

Lake County urges the Bureau to continue an aggressive weed management program. More cooperative efforts such as the Warner Valley project should be undertaken. Noxious weeds may present the most significant threat to the native ranges of Lake County. The threat is not because of poor management but because of the general spread of noxious weeds in the West. Lake County believes weeds will continue to be a chronic problem. Because the source is so widespread, roadsides, disturbed and burned areas will be prone to infestation.

We believe it is important to have an aggressive juniper management program. Although juniper has been part of the landscape since the settlers arrived here, our recent success with controlling and preventing fire has allowed juniper to expand outside its historic range. Juniper is negatively affecting the natural plant communities in the areas it is invading.

It is very apparent on the landscape where juniper has historically occurred. Outside those historic sights, juniper should be considered an invasive species and treated accordingly. It robs water from springs and creeks reducing normal flows sometimes to the point of drying them up during summer and fall periods. Redband Trout and Warner Sucker habitat is adversely affected. Juniper is also spreading into areas of Sage Grouse habitat. Finally, thick stands of second growth or invasive juniper increases fire danger and causes fire to burn hotter, causing additional habitat damage from range fires.

Lake County supports new management strategies to address concerns due to recreational use of the Sand Dunes and Lost Forest Area. These are obviously unique sites that are popular with recreation users. Although we do not support making areas of the public land "off limits" to the public, we do support providing alternative camping areas in less sensitive locations nearby. With more information about the damage that can be done to these unique sites and cooperative efforts with private land owners to provide improved campgrounds in the area, you may accomplish the desired results, re; allowing recreational use while preventing permanent damage to the resource.

The following are comments specific to Alternative D, the preferred alternative of the Draft Lakeview Resource Management Plan/ Environmental Impact Statement.

The lands administered by the Bureau of Land Management in the Lakeview Resource Area are "Public Lands". The majority of the public who communicates with us is concerned about the closing of roads under the preferred alternative. These roads are used very little, have been in existence for many years and have been an integral part of the public's access to their public land. To restrict access is only going to cause otherwise good people to violate federal law doing something that has always been acceptable. There does not seem to be a strong case in your draft management plan for why the historic use of unimproved roads is now a resource management problem. The management problems will come from the alienated public land users who have supported your work up to this time. We strongly suggest you recognize these roads for what they are; historic uses that go back in many cases 75 or more years. Do not close roads

223-2

Table 2-20 on page 2-29 of volume one of the draft RMP, Native Species of the Lakeview Resource Area refers to "Modoc Sucker". However, the narrative regarding species and habitat on pages 2-28, 2-29 and 2-30 does not include the "Modoc Sucker. Our information is the Modoc sucker exists in two locations in Modoc County, California. Last year a U.S. Fish and Wildlife Service biologist discovered that lab specimens at OSU taken from streams in the north west Goose Lake Basin were Modoc Suckers. To our knowledge it has not been determined that Modoc Suckers are now or ever have been a native species within the Lakeview Resource Area of the Bureau of Land Management.

223-3

The Lakeview Resource Area as well as the other public and private lands within Lake County are rich with cultural resources. To identify specific areas to protect as ACEC's because of cultural resources does not seem logical. Why are some areas more important than others? Has the BLM documented that specific areas are more important to protect than an area that has not been recommended for protection under the terms of ACEC designation? Our belief is that cultural resources are already fully protected under federal law. What additional protection will this designation afford the areas proposed as ACEC's for cultural resource purposes that is not available under current Federal policy? Elevating the areas to special designation because of these resources may increase the awareness and subsequent illegal activities. Isn't the real problem one of lack of enforcement of existing federal law and policy? Will you have more money to enforce the provisions of an ACEC's cultural values? If these values are of such importance, why have they not been protected more vigorously before now? What real threats besides vandalism are there? Vandalism is already a violation of Federal Law.

223-4

Lake County believes the same argument is true for designations made on the basis of threatened or endangered plant species. The plants have survived the 100 plus years since the settlers arrived here. They have survived un-managed grazing, drought, fire and now "management". What is a special designation going to do for these plants that you are not already doing? If this new management designation includes some provision to protect that is not currently being employed,

223-2: Table 2-20 also lists Goose Lake sucker and Pit brook lamprey, species that occur in the Goose Lake system where the Modoc sucker is believed to occur. The only BLM-administered reach of stream in which these fish may possibly occur, although not documented, is in Crane Creek in the LRA.

223-3: It is true that the resource area has many important cultural areas, but the relative importance of an area is subjective. Analysis of the existing situation determined that these areas were already highlighted as being in need of special management because of ongoing impacts, desires for use by Native Americans under treaty rights, and are well known to the public. The ACEC is a vehicle to highlight the problems and special management opportunities, and to allow for the development of more detailed activity plans for protection and use of the areas, if needed. Funding for management is tied to designations with special programs and needs. These areas are already well-known and are increasingly being visited by the public. Other activities, such as grazing, mining, and recreation, are or could be impacting the resources present. With limited funding and personnel, the designations would highlight these areas for funding and increased protection and enforcement.

223-4: ACEC designations are not made solely on the basis of threatened or endangered plant species. Federal laws already protect them. In fact, no federally-listed plant species currently are known to occur in the planning area, and no ACEC's are being proposed for their protection. See also response to comments 114-3 and 219-2.

L-223

why did you wait until now to implement that provision? Are there any real threats that can not be addressed under current management policies or federal law?

We assert the same is true for the Fossil Lake proposal and those ACEC proposals based on the need to protect traditional cultural plants and gathering grounds. Federal law already protects the areas.

Simply saying a resource has special significance does not give it protection. Enforcement provides protection, and, it takes money and man power to provide enforcement. Protection is only as good as the enforcement behind it. If you are implementing good enforcement of current policies and law, is there really a need for more protection? Or is the real need one of more enforcement.

We have a feeling there are botanists, biologists, archeologists, geologists or special interest groups who are concerned about "pet" project areas and have elevated them in their own mind to a higher level of protection than the resource truly needs. Because of their position in the Agency or their ability to attract attention through threat of appeal or law suit, their special interests have been addressed by proposed designation of SMA's. That any one of us has a favorite area in Lake County is not surprising. But that is not an acceptable justification for special management. All the areas of Lake County deserve good management which is the current practice of the Agency. The issue is one of restricting the public's use of public land. We don't believe the public of Lake County generally agrees with the concept of more restricted areas nor specifically agrees with any one of the proposed SMA's.

Why is it necessary to "layer" special management areas. Ten of the 12 proposed ACEC's will also be designated RNA's. This seems to us to be redundant.

If special management areas are justified, either WSA,s, RNA,s, ACEC,s or Wild and Scenic Rivers, we request that adequate setback from existing County Roads or State and Federal Highways be maintained to allow for future road improvement and realignment. An example of this problem is the WSA on Doherty Slide, Highway 140E, which makes realignments for curve correction difficult or impossible.

In summary, the Lake County Commissioners wish to reiterate our support for the current management of the Lakeview Resource Area including the staff and the effort being made. It appears to us you have adequate tools to accomplish the task of managing the public lands under your jurisdiction. We believe you are doing a good job and the evidence of your efforts of the past few years are beginning to show. It also appears unlikely that implementing special management areas and restrictions on the use and access to public lands on existing roads is going to result in improved conditions. You are only going to lose local supporters and cause yourself an enforcement nightmare.

223-5: SMA's are not "layered;" RNA's are proposed for research because they contain high quality Oregon Natural Heritage Program plant community cells. A number of other Federal agencies have specific RNA management guidelines. In contrast, the BLM does not have specific management guidelines for RNA's, but by policy, manages them under the ACEC's guidelines (USDI-BLM 1988). Also see response to comment 219-2.

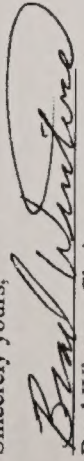
We believe our views represent the vast majority of citizens and public land users of Lake County. Our recommendations are as follows:

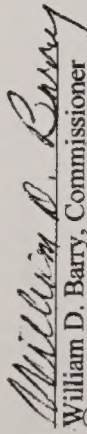
1. Continue grazing as it is and allocate extra AUM's to wildlife.
2. Fully implement and fund the Interim Sage Grouse Management Strategy.
3. Adopt a more aggressive juniper and weed control program.
4. Address the issues created by the high recreational use of the Sand Dunes, Lost Forest and Fossil Lake areas.
5. Do not limit road access beyond current management standards.
6. Do not establish new or expanded special management areas.
7. Enforce existing rules and regulations before adding more.

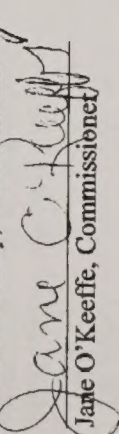
Finally, do more to educate the public land user on impacts of their use and how to minimize negative impacts. Most users are not there to destroy the resource. They are there to enjoy it. This may require getting some more of your agency people in the field during high use periods such as weekends and holidays.

Please accept and enter in the public record our comments on the Draft Lakeview Resource Management Plan and Environmental Impact Statement.

Sincerely yours,


Brad Winters, Chair


William D. Barry, Commissioner


Jane O'Keeffe, Commissioner

RECEIVED
JAN 31 2002
LAKEVIEW, B.L.M.

David F. Ortwein
728 South I Street
Lakeview, Oregon 97630

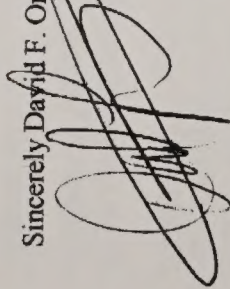
January 30, 2002

After reviewing your report. The proposals to close the roads in the areas listed in the resource management plan are not needed at this time. I have used many of the roads for recreation, hunting, fishing, viewing wildlife and viewing petroglyphs. I believe that limiting many of the roads will create an undo burden to hunters. I am concerned with the Abert Rim closures as a safety factor. Many people who are wildlife viewers, hunters, sheep watchers, pull off on these roads to enjoy this type of recreation. The 395 highway in that area is very narrow and there are few pullouts. In closing these roads it will force people to park on the roads edge. I regretfully think that this will result in many serious and critical injuries. I spoke with a B.L.M. employee on the issues of closing the roads. He stated that many of the proposed roads were in bad need of repair. I hope that you are not just planning to close those roads just because they need repair. If we all followed these guidelines Lakeview would not have a hi-way to it. More jobs are needed in the area so why not budget some dollars to have these roads repaired. There are a lot of local people who would love a job on a B.L.M. road crew. There are a lot of local contractors who need work also.

224-1

224-1: In the Abert Rim area, no pullouts along Highway 395 would be closed under this plan. Three short, rough vehicle trails that lead to wildlife guzzlers or are already blocked by private fences would be closed. The remaining roads proposed for closure are on the top of Abert Rim. Refer to Map SMA-7.

Sincerely David F. Ortwein



Lake County Chamber of Commerce

126 North E Street
Lakeview, OR 97630
(541) 947-6040 (fax) 947-4892
1-877-947-6040

RECEIVED
JAN 31 2002
LAKEVIEW, B.L.M.

January 31, 2002

Bureau of Land Management
1301 South G Street
Lakeview, OR 97630

Attn: Dwayne Sykes, RMP Team Leader

The Lake County Chamber of Commerce Board of Directors has requested that I comment in their behalf on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) and the alternatives addressed within the proposed land use plan.

The mission of the Chamber is to support local businesses throughout the county and to promote recreation and tourism activities. We believe that tourism development is an important part of our economic development strategy.

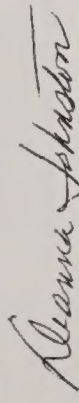
We urge you to adopt Alternative A - No Action. We are pleased with the current management of BLM public lands and applaud your continued support of outdoor recreation. We would like to see public lands continue to be available for public use. We understand that it is important to conserve our natural resources and encourage continued educational programs that would promote wise use and restoration of public lands. However, we do not want to see more roads and culverts obliterated or more road closures. We do not want more WSA's, ACEC's, WSR's or SMA's. Instead, we would like to have opportunities to conclude the studies in areas that are currently set aside to allow for public use once again.

225-1

One area of concern is the WSA located at Doherty Slide. Our Lake County Highway Advisory Committee and more recently the South Central Oregon Area Commission on Transportation for the Klamath/Lake Partnership, have been working with our legislators and Oregon Department of Transportation to develop a long term highway improvement plan for Highway 140 in order to remove safety hazards thereby removing truck length restrictions. The WSA designation severely limits choices for improving Highway 140 over Doherty Slide.

Again, we are hard at work encouraging tourists to visit our beautiful Oregon Outback. We will spend \$25,000 this year on our advertising campaigns. We would like to see Alternative A adopted. Thank you for your consideration of our request.

Sincerely,



Deanna M. Johnston
Executive Director

225-1: The southwest boundary of the Spaulding WSA is the Highway 140 right-of-way along Doherty Slide. The BLM has provided the Lake County Board of Commissioners a map showing the location of this boundary. At this time, any highway work at Doherty Slide would have to be within the highway right-of-way, since the BLM cannot authorize any surface-disturbing actions within a WSA. Any changes in the boundary of a WSA must be done by Congress. Therefore, changing the boundary of the Spaulding WSA at Doherty Slide is beyond both the scope of this RMP and the BLM's management authority. This is described further in the "Alternatives Considered but Dropped from Further Analysis" section at the beginning of Chapter 3.

L-225



17612 HWY 385
Lakeview, OR 97630
Phone (541) 947-5855
Fax (541) 947-5854
e-mail: lakeview-swcd@or.nadnet.org

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JAN 31 2002

Lakeview Soil & Water Conservation District

January 30, 2002

Dwayne Sykes, RMP Team Leader,
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Refer to: Comments Draft Lakeview Resource Management Plan/EIS

Dear Mr. Sykes:

I believe you and your team should be commended on your objectivity, data collecting, interpretations and writing a good draft report. My personal bias is the report is weak in terms of soils information.

I am very pleased with the emphasis placed on Proper Functioning Condition (PFC). I believe all streams and riparian areas should be assessed, evaluated and monitored on a planned and regular basis. Perhaps combining Alternatives A and B, and increasing the goal from 75% to 90% plus for PFC, is in order.

With improved PFC, BLM will assist the folks downstream having to deal with developing a plan on private land under the Oregon State Law, Senate Bill 1010. This will form a partnership with BLM and private landowners towards improving water quality and managing Total Maximum Daily Loads.

Thank you for the opportunity to comment on the draft EIS.

Respectfully,

Don Lucas
Donald L. Lucas
Chair, Lakeview SWCD

226-1

226-2

226-1: Some of the data (north Lake County survey area) has not yet been completed. The BLM is aware that detailed soil information, such as current mapping unit description, erosion class, and other characteristics of individual soils, can be found in both published and unpublished soil surveys at the local USDA-Natural Resource Conservation Service offices. A summary description of the major soil mapping units of southern Lake County and west-central Harney County has been added to Appendix C. A general soils map has also been developed (Map S-1).

226-2: "A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lotic Areas" and Appendix E: "PFC—What It Is and What It Isn't" (USDI-1998i), describes the value of proper functioning condition and its weaknesses. It states that proper functioning condition should not be used as the sole methodology for assessing the health of riparian wetland areas, nor is it necessarily the final desired condition. Furthermore, it states that proper functioning condition is not designed to provide monitoring answers about attaining desired condition. Proper functioning condition is an initial step in determining problem areas needing immediate attention and the need to further define the problems and treatment priorities. Proper functioning condition is a first step, not a final goal.

To determine goals and objectives for riparian sites, the BLM desires to move beyond proper functioning condition and determine a range of desired future conditions based on site potential for stream channel and vegetation condition. Specific goals for a stream reach will be specified based on Rosgen channel type and riparian scorecard (currently under development) of vegetation status. This level of goal setting is needed to comply with total maximum daily loads (when they are determined) and to better manage streams to balance resource needs with riparian condition. Recognition must be given to the fact that not all stream reaches would be managed to achieve "potential natural community;" some lower level of condition may be specified to meet other resource needs.

Also see responses to comments 256-14, 257-5, and 257-6.

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JAN 31 2002

Lake County Farm Bureau

12154 Westside Rd, Lakeview, OR 97630 phone: 541 947 2482

January 30, 2002

Dwayne Sykes, RMP Team Leader
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Subject; Draft Lakeview Resource Management Plan/EIS

Dear Mr. Sykes:

227-1

The Lake County Farm Bureau Board of Directors believes Wilderness Study Areas should be brought a conclusion. Whatever the designation, BLM could then manage the areas accordingly.

There should be access to all wildernesses for the elderly, disabled and all people. Scenic values, scientific values and, interpretive values should not be locked away from people.

We believe Alternative A, is the best way for the resource area to be managed.

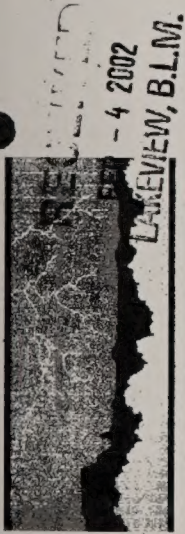
Thank you for the opportunity to comment on the draft EIS.

Respectfully,

Don Lucas

Donald L Lucas
Chair, Lake County Farm Bureau

227-1: Please see response to comment 274-4. Both the "Wilderness Act" and the "Americans with Disabilities Act" allow the use of wheelchairs in designated wilderness by individuals whose disabilities require the use of a wheelchair. However, the managing agency is not required to construct any facilities within a wilderness area to facilitate such use.



Oregon Natural Desert Association

31 January 2002

VIA FACSIMILE AND U.S. MAIL

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview OR 97630

Re: Comments on Draft Lakeview Resource Management Plan/Environmental Impact Statement

Dear Mr. Sykes:

Please accept these comments made on behalf of the Oregon Natural Desert Association, the Northwest Environmental Defense Center, and the Oregon Natural Resources Council, on the BLM's Draft Lakeview Resource Management Plan/Environmental Impact Statement (RMP/EIS).

The Oregon Natural Desert Association (ONDA) is a non-profit public interest organization dedicated to preserving and protecting the public lands of eastern Oregon. ONDA has a long history of interest and involvement in Bureau of Land Management activities with respect to grazing, riparian areas, water quality, and fish and wildlife. ONDA's mission is to protect, defend, and restore forever, the health of Oregon's native deserts. The members and staff of ONDA use and enjoy the public lands, waters, and natural resources within the planning area for countless recreational, scientific spiritual, educational, aesthetic, and other purposes. ONDA and its members also participate in information gathering and dissemination, education and public outreach, commenting upon proposed agency actions, and other activities relating to the BLM's management and administration of the public lands of eastern Oregon.

The Northwest Environmental Defense Center (NEDC) is a non-profit public interest organization dedicated to preserving, protecting, and improving the natural environment in the Pacific Northwest. NEDC is based in Portland, Oregon, and has been working since 1969 to protect the environment and natural resources of the Pacific Northwest by providing legal support to individuals and grassroots organizations with environmental concerns, and engaging in litigation independently or in conjunction with other environmental groups. NEDC's membership consists of a Board of practicing attorneys and law students along with local citizens interested in the shared goal of protecting the environment through legal means. The members of

16 NW Kansas • Bend • Oregon • 97701 541-330-2638 Fax: 541-385-3370 email: onda@onda.org website: www.onda.org
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NEDC derive educational, scientific, aesthetic, recreational, spiritual, and other benefits from their use of our public lands.

The Oregon Natural Resources Council (ONRC) is a non-profit public interest organization whose mission is to aggressively defend Oregon's wild lands—its forests, rivers, coast, and high desert. ONRC is a conservation consortium promoting environmental protection by educating the public and influencing the public's servants through legal and legislative processes. ONRC's field staff works directly with local citizens and citizen groups to incorporate environmental concerns into statewide, regionwide and nationwide programs.

For the reasons that follow, ONDA, NEDC, and ONRC (hereinafter collectively referred to as "ONDA") respectfully request that the BLM supplement its EIS with the required information and analysis, and comply with the requirements of the National Environmental Policy Act, the Clean Water Act, the Federal Land Policy and Management Act, the Federal Rangeland Health regulations, and the BLM's Land Use Planning Manual and Handbook.

I. Inadequate Range of Alternatives

The RMP/EIS considers an inadequate range of alternatives, particularly with respect to livestock grazing¹: Alternatives A through D provide for "sustained yields" of approximately 108,000, 119,000, 87,000, and 108,000 AUMs, respectively, and Alternative E eliminates grazing entirely. This all-or-nothing approach with respect to grazing violates the National Environmental Policy Act's (NEPA), 42 U.S.C. §§ 4321-4370(e), requirement that federal agencies analyze a reasonable range of alternatives. *Id.* §§ 4332(2)(C)(iii) (EIS must contain "a detailed statement [of] . . . alternatives to the proposed action"); 4332(2)(E) (independent requirement that agencies must "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources").

The inclusion of Alternative C's 87,000 AUMs appears to be a token attempt at satisfying NEPA's range of alternatives requirement. However, this still violates NEPA because no alternative alters the approximately 2,938,434 acres of public lands open to livestock grazing. See RMP/EIS at 2-39. In other words, no alternative even considers closing to grazing more than 8% of the public lands in the Lakeview RMP planning area. Further, no alternative (other than Alternative E) considers limiting livestock grazing to less than 80% of current levels. See *id.* at 3-22 and Table 2-27. The Ninth Circuit has held that even where an agency's "decision criteria" were diverse, the resulting alternatives were not where none of eight alternatives allocated more than 33% of the planning area to wilderness in a roadless area review EIS. *Cal. v. Block*, 690 F.2d 735 (9th Cir. 1982). Neither does the RMP/EIS's Alternatives E cure this problem because that alternative is not viable. NEPA requires that all alternatives must be reasonable. See 40 C.F.R. §§ 1502.14 (EISs must "[r]igorously explore and objectively evaluate all reasonable alternatives") (emphasis added); 1508.25 (scope of alternatives considered in an EIS must consist of "reasonable courses of actions"). "Straw-man" alternatives fail to satisfy this requirement.

¹ The RMP/EIS also present an inadequate range of alternatives with respect to off-highway vehicle usage, which is discussed in more detail below in section IX.

228-1

228-1: The grazing analysis in Chapter 4 has been revised to more accurately reflect the wide range of alternatives considered. Alternatives A and D consider the permittees' option of using up to 164,128 AUM's (full active preference). Alternative B considers licensing up to 10 percent above current preference (180,541 AUM's). Alternative C considers 86,587 AUM's use, or approximately 50 percent of Alternative B. Alternative E considers 0 AUM's use (no grazing).

Some components of Alternative E would be legally difficult to implement and thus could be considered unreasonable. However, the BLM felt it was necessary to consider and analyze the elimination of commodity production, including grazing, mining, mineral leasing, and other commercial uses from the public lands to compare to the impacts of other alternatives. Alternative E provides useful information to decision makers and responds specifically to some public scoping comments.

Note also that a 2001 BLM Instruction. Memorandum states, "The impacts of all alternatives addressed must be fully analyzed in the NEPA document. They must also reflect the actual situation on the ground." U.S. Dep't of the Interior, Bureau of Land Mgmt., Instruction Memorandum No. 2001-075, at 2 (January 19, 2001) (hereinafter "IM 2001-075"). See also *id.* at 4 ("[A] narrow interpretation of the concept of multiple use cannot be used to justify limiting the range of alternatives analysis") (citing Memorandum of Interior Solicitor, "Jack Morrow Hills Coordinated Activity Plan" (December 22, 2000), at 2 and forward (hereinafter "Sol. Memo")). In short, the RMP/EIS fails to present and analyze a reasonable range of alternatives that comply with the planning criteria and existing law.

II. Failure to Discuss Impacts, Cumulative Impacts, and New Information

The RMP/EIS fails to discuss adequately impacts and cumulative impacts, attempting instead to rely on "adaptive management" as a proxy for an actual cumulative impacts analysis.

Failure to Discuss Impacts Adequately. NEPA states that an "effect"² on the environment may be either a "direct effect" or an "indirect effect." 40 C.F.R. § 1508.8. A direct effect is "caused by the action and occur[s] at the same time and place." *Id.* § 1508.8(a). An indirect effect is caused by the action and occurs later in time or removed in distance, but is "still reasonable foreseeable." *Id.* § 1508.8(b). Indirect effects may include effects related to induced changes in land use patterns or related effects on water, air, and "other natural systems, including ecosystems." *Id.* All effects may be ecological, aesthetic, historic, cultural, economic, social, or health related, whether direct, indirect, or cumulative. *Id.* § 1508.8. The RMP/EIS simply fails to discuss impacts at all for certain ecosystem components, such as microbiotic crusts. The BLM acknowledges the importance of crusts as ecosystems components and indicators of rangeland health in the discussion of the affected environment. RMP/EIS at 2-19 to 2-20. However, the document then fails entirely to analyze the impacts on crusts in Chapter 4. See *id.* at 4-35. Similarly, while the RMP/EIS correctly states that "[s]oils are the foundation for all vegetation growth in the planning area" and "[w]ithout a good base of healthy, productive, intact soils, management goals for vegetation and watershed and ultimately wildlife and livestock cannot be achieved"—the discussion of impacts in Chapter 4 is perfunctory at best. Statements such as "Impacts to soils from OHV use could be significant under this alternative [D]" fall well short of the analysis of impacts that is required under NEPA. See *id.* at 3-53, 4-35.

Failure to Discuss Cumulative Impacts Adequately. A "cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency . . . or person undertakes such other actions." 40 C.F.R. § 1508.7. Cumulative impacts can result from "individually minor but collectively significant actions taking place over a period of time." *Id.* See also *id.* § 1508.25(a)(2) (scope of EIS must include cumulative impacts).

The RMP/EIS fails to assess the cumulative impacts on the environment of maintaining existing levels of grazing. Although the document attempts to address impacts and cumulative impacts of each alternative on livestock grazing as a program, the RMP/EIS fails to discuss

² Note that an "effect" is synonymous with an "impact" in NEPA and its regulations. 40 C.F.R. § 1508.8.

228-2: In general, the BLM believes cumulative effects have been adequately addressed. Chapter 4 of the Proposed RMP/Final EIS provides a Summary of Impacts and Secondary, Indirect, and Cumulative Impacts for each resource. These cumulative effects analyses address all programs or land uses which might create reasonably foreseeable cumulative adverse or beneficial effects. Information regarding cumulative impacts from grazing has been added to Chapter 4 for several resources.

cumulative impacts on the environment as a result of grazing. RMP/EIS at 4-82 to 4-83. Otherwise, the RMP/EIS offers only optimistic expectations: "Management practices outlined under this [preferred] alternative would support the [Standards and Guidelines]. If livestock are the causative agent in nonattainment of a standard, then actions would be taken." *Id.* at 4-82. Rather than assess cumulative impacts in the RMP/EIS, as is required by law, the BLM has relied on "adaptive management" as a way to put off any thorough and probing analysis of cumulative and connected actions—i.e., the BLM has failed to take the requisite "hard look" at the potential environmental impacts of the proposed action. See *Blue Mtns. Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1211 (9th Cir. 1998); *Neighbors of Cuddy Mtn. v. U.S. Forest Serv.*, 137 F.3d 1372, 1380 (9th Cir. 1998) (general statements about "possible" effects and "some risk" do not satisfy NEPA, nor is it appropriate to defer consideration of cumulative impacts to a future date). Furthermore, where the BLM has failed to discuss impacts on certain resources (e.g., microbiotic crusts and soils, as above), there is certainly no discussion of cumulative impacts with respect to these resources. See e.g., RMP/EIS at 4-36 ("Summary of Impacts" for soils).

Failure to Discuss New Information Adequately. Similarly, the RMP/EIS fails to address new information that has emerged during the drafting of the RMP/EIS. In the fall of 2001, the Department of the Interior issued a Technical Reference discussing in great detail the ecology and management of microbiotic crusts (also known as biological soil crusts or cryptobiotic crusts). Jayne Behnap et al., "Biological Soil Crusts: Ecology and Management," U.S. Dep't of the Interior, Tech. Ref. 1730-2 (2001) (available at www.id.blm.gov/publications/data/Crust%20Manual.pdf) (hereinafter "Tech. Ref. 1730-2"). Federal agencies are subject to a continuing duty to supplement existing EAs and EISs in response to "significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." 40 C.F.R. § 1509(c)(1)(ii); see also *Marsh v. Ore. Natural Res. Council*, 490 U.S. 360, 372-73; *Idaho Sporting Cong. v. Thomas*, 137 F.3d 1146, 1152 (9th Cir. 1998) (holding that the standard for supplementing an EA is the same as for an EIS). Yet, the RMP/EIS fails to cite or consider the recent Interior/BLM publication, relying instead on an unpublished Masters thesis in its brief discussion of microbiotic crusts. See RMP/EIS at 2-19 to 2-20. The BLM even states that "[t]he LRA has very little microbiotic crust monitoring or research other than Ponzetti's few plots. *Id.* at 2-20. Similarly, the RMP/EIS fails to mention the useful and necessary monitoring and research methods detailed in the DOI crusts publication. See *id.* at 3-53 (stating only that soil health and condition "would be monitored by conducting project reviews for implementation and effectiveness of BMP's [sic] and assessing undisturbed sites for various parameters"). The Ninth Circuit has "repeatedly warned that once an agency determines that new information is significant, it must prepare a supplemental EA or EIS." *Idaho Sporting Cong. v. Alexander*, 222 F.3d 562 (9th Cir. 2000).

III. Failure to Disclose Assessment and Inventory of Acres Suitable for Livestock Grazing

The RMP/EIS fails to disclose adequate criteria for the BLM's assessment of acres suitable for livestock grazing. As well, the acreage in the preferred alternative where grazing is not authorized is miniscule in comparison to the total acres authorized for grazing: only 261,566 acres are not authorized, out of a total of approximately 3.2 million acres. This represents only

Comments on Lakeview Draft RMP/EIS

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The contrast between the various alternatives illuminates the differences in effects in both the short and long term, especially for continued livestock grazing on public lands. At the scale of the RMP decision making, site-specific impact assessment is not practical. The RMP is designed to set broad goals and objectives for resource management.

The cumulative impacts of additional grazing pressure on wildlife habitat in Alternative B would be site-specific, depending on the type of habitat grazed. Additional pressure to riparian/wetland systems would have the greatest potential for impact. The BLM has already installed exclosures and management strategies within most of these systems to address riparian/wetland concerns. The BLM would use the allotment evaluation or Rangeland Health Standards and Guidelines assessment process to address potential future impacts. We have implemented grazing systems and modified turnout schedules in deer winter range allotments to reduce competition between domestic livestock and wintering deer herds on winter browse species (bitterbrush, mountain mahogany, and other browse species). Through coordination with ODFW, we completed allotment-specific evaluations to address existing or potential conflicts between cattle and big game (mule deer, pronghorn, and expanding populations of elk and bighorn sheep). The BLM also met with ODFW to discuss wildlife allocations and identify any existing or potential future conflicts between domestic livestock and expanding populations of elk and bighorn sheep. We agree that forage allocations (AUM's) for wildlife are somewhat misleading, but the numbers are included to highlight wildlife use within the given allotment. Table 2-26 depicts existing and proposed changes to wildlife allocations. Forage allocations are made based on the dietary preferences of cattle and do not necessarily reflect the food resources available for wildlife consumption. The existing allocations were completed 20 years ago and do not represent the current distribution of wildlife within the resource area. Deer and pronghorn use has changed since the original allocation, and elk and bighorn sheep have expanded in numbers and into new ranges. The other wildlife category will be modified to reflect not only raptors, small mammals and birds, as originally designed, but will also consider important shrub-steppe species, such as greater sage-grouse. Wildlife allocations (AUM's) will only be used for purposes of species use. Identification of conflict between wildlife and domestic livestock use will be evaluated during the allotment evaluation process. We are also complying with the interim management guidelines for greater sage-grouse as they pertain to grazing and would amend this RMP, if necessary, to comply with guidelines that appear in the long-range conservation plan for greater sage-grouse.

228-3: The most current data and inventories were used to develop the resource descriptions presented in Chapter 2 of the Draft and Proposed RMP/Final EIS documents. The benefit of continuing inventories for planning is recognized. The information used in this analysis is the best available that can be reasonably supported. Inventory and monitoring would continue after the plan is approved.

8% of the planning area and maintains the status quo. Nowhere in the RMP/EIS does the BLM reveal its criteria or assessment for its determination of which acres are or are not suitable for grazing. In fact, the document actually states, "It is the BLM's position that the Secretary of Interior already made this determination when grazing districts were established." This directly violates NEPA, the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. §§ 1701-1784, the Taylor Grazing Act, 43 U.S.C. §§ 315-315r, and the BLM's Land Use Planning Manual and Handbook.

The Taylor Grazing Act requires the BLM to set forth its criteria and assessments for grazing suitability determinations. 43 U.S.C. § 315. Enacted "[t]o stop injury to the public grazing lands by preventing overgrazing and soil deterioration," 48 Stat. 1269, preamble, June 28, 1934, the Taylor Grazing Act requires the Secretary to determine the characteristics of a parcel of land, classify that land based on its characteristics, and then regulate the use of the land based on its classification. 43 U.S.C. § 315. Because Congress was cognizant of the severe ecological damage that overgrazing had caused, the Act requires the Secretary to determine that land is "chiefly valuable" for grazing prior to including such land within a grazing district. This determination must be supported by an administrative record. *Id.* (requiring the Secretary to make the determination "by order"). See also *Citizens to Preserve Overton Park v. Volpe*, 401 U.S. 402, 420 (1971) (determination must be supported by sufficient administrative record); *Motor Vehicles Mfrs. Ass'n v. State Farm Mutual*, 463 U.S. 29, 43 (1983) (agency must "examine the relevant data and articulate a satisfactory explanation for its actions including a rational connection between the facts found and the choice made") (internal quotes omitted).

FLPMA further animates the TGA's classification and assessment requirements by requiring the BLM to undertake an exhaustive and continuing inventory of the public lands and to use this inventory to develop land and resource management plans. 43 U.S.C. §§ 1711-1712. See also 43 C.F.R. § 1610.4-4 (requiring District or Area Manager to "analyze the inventory data and other information available to determine the ability of the resource area to respond to identified issues and opportunities" and requiring that the "analysis of the management situation shall provide . . . the basis for formulating reasonable alternatives"); *id.* § 1610.4-3 (requiring data and information collection with an eye to subsequent monitoring); BLM Land Use Planning Handbook, H-1601-1, (hereinafter "Handbook") at III-3. Moreover, the BLM must assess the existing and collected information. See BLM Land Use Planning Manual (hereinafter "Manual") at 1601.02B (evaluate information considering biological resources); Handbook at III-1 (discussing the differences among inventory, assessment, and monitoring).

Finally, NEPA requires that an agency provide a "full and fair discussion" of significant environmental impacts and that statements "shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses." 40 C.F.R. § 1502.1 (purpose of an EIS). The BLM fails to do so in the RMP/EIS.

The RMP/EIS's treatment of this issue is inadequate. The RMP/EIS states cursorily that 261,566 acres of public land have been set apart from grazing allotments either "to improve or protect resource values" or "they were found to be unsuitable for livestock grazing." RMP/EIS at 2-39. Not only does this evidence the fact that the BLM has failed to make any affirmative and informed determinations as to grazing suitability—but this also indicates that the BLM is unable

Comments on Lakeview Draft RMP/EIS

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As new information becomes available during or as a result of plan implementation, it will be evaluated. New information will be incorporated through plan maintenance and adaptive management. If new information clearly indicates a need to make a significant change to the livestock or other resource management direction outlined in the Proposed RMP/Final EIS, a plan amendment will be pursued, consistent with the planning regulations.

The reference by Belnap was considered in the Draft RMP/EIS under the reference "USDI-BLM and USGS 2001". Refer to Literature Cited section. We included this new information in the draft and have enlarged the discussion of microbiotic crusts in Chapter 2 of the Proposed RMP/Final EIS.

228-4: Within the "Taylor Grazing Act," the Secretary of Interior is authorized ". . . in his discretion, by order to establish grazing districts or additions thereto and/or to modify the boundaries thereof . . . which in his opinion are chiefly valuable for grazing and raising forage crops." 43 U.S.C. § 315. As a result, ". . . chiefly valuable . . ." determinations were made with the implementation of "Taylor Grazing Act" in the 1930s to differentiate public domain within grazing districts and public domain outside. The Act defined processes for administering public land livestock grazing within grazing districts under a permit system, different from those processes for administering livestock grazing outside grazing districts under a lease system. It did not differentiate between public land where grazing would and would not be authorized. All public lands in the Lakeview RMP planning area are within the Lakeview Grazing District. Land use planning policy does not require making these "chiefly valuable" decisions again. Even if these determinations were revisited, lands determined to not be chiefly valuable for livestock grazing and withdrawn from the grazing district could continue to be grazed, as authorized by section 15 of the Act.

or unwilling to develop actual criteria or assessment standards for making such a determination. That is, the public—not to mention the BLM employees charged with implementing the plan—is left without any indication whatsoever regarding what criteria define “suitability.”

IV. Violations of FLPMA’s Multiple Use Requirement and the Unnecessary or Undue Degradation Standard

FLPMA requires the BLM to manage the public lands consistent with the “principles of multiple use and sustained yield.” 43 U.S.C. § 1732(a). This means the BLM must “take into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values.” *Id.* § 1702(c). FLPMA’s multiple use mandate requires management of resources “without permanent impairment” of the quality of the environment. *Id.* The primary standard for the BLM’s management of the public lands requires that “the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands.” *Id.* § 1732(b) (emphasis added).

To comply with FLPMA’s multiple use mandate, the BLM must balance competing resource values to ensure that the public lands are managed in a manner “that will best meet the present and future needs of the American people.” *Nat’l Wildlife Fed’n v. BLM*, 140 IBLA 85, 101 (August 21, 1997), *quoting*, 43 U.S.C. § 1702(c). This balancing of competing resource values must be made by engaging in a reasoned and informed decision making process. 140 IBLA at 101. In the RMP/EIS, the BLM has failed to balance competing resource values in a reasoned and informed manner and adequately consider the present and future needs of the American people. Because of these failures, the BLM has violated FLPMA’s multiple use mandate.

228-5

The Supreme Court recently confirmed that the BLM has the authority in the FLPMA land use planning process to “withdraw land from grazing altogether and devote it to a more valuable or suitable use.” *Public Lands Council v. Babbitt*, 529 U.S. 728, 736 (1999) (citing federal grazing regulations). Current IBLA precedent indicates that the graze/no graze decision is made at the RMP level—not at the activity levels through adaptive management. See, e.g., *Ore. Natural Res. Council Action*, 148 IBLA 186, 189–90 (1999). In order to have an adequate basis to make this monumental decision in accordance with FLPMA’s multiple use and undue degradation provisions, the BLM must do more than that which is presented in the RMP/EIS.

Although the RMP/EIS includes (and rejects) Alternative C, which limits livestock grazing to approximately 80% of current levels (the lowest such percentage among the viable alternatives), the preferred alternative maintains the status quo and proposes to continue grazing at existing levels and on 92.5% of the public lands within the planning area. RMP/EIS at S-6 and 3-70. The document states, without further explanation, that “[k]nown problems pertaining to livestock grazing are not related to existing forage allocations, but needed changes in management such as season of use.” *Id.* at 2-38. By failing to assess the on-the-ground conditions and the impacts of current livestock grazing in the land use planning process, the BLM has maintained the status quo by default. As a result, the BLM has failed in its duty to

Comments on Lakeview Draft RMP/EIS

-6-

228-5: Several alternatives analyze areas where livestock grazing is excluded to protect other resource values (Tables 2-28 and 3-3). Appropriate livestock management actions on an allotment-specific basis may include exclusion or changes to seasons and/or intensities of use, as identified in Appendix E, and would be implemented through the allotment management planning process. Areas where exclusion currently occurs or may be implemented under the Proposed RMP/Final EIS include riparian vegetation communities adjacent to streams, reservoirs, springs, and wetlands; developed water sources; special status plant or animal habitats; some existing and proposed ACEC/RNA’s; one proposed WSR; some WSA’s; research and study plots; administrative sites; recreation sites; and waste disposal sites. Livestock grazing would not be allocated (or unallotted) or would be excluded from some areas under most of the alternatives considered, including the preferred Alternative D (refer to Tables 2-28 and 3-3).

Chapter 4 of the Proposed RMP/Final EIS provides an analysis, by both resource value and alternative, on the anticipated impacts of livestock grazing and other management practices. Appendix E provides information of the proposed seasons and intensities of livestock grazing by allotment.

make a reasoned and informed decision in the public interest with respect to whether the land within the planning area will continue to endure extensive livestock grazing.

In Nat'l Wildlife Fed'n v. BLM, 140 IBLA 85 (1997), the IBLA ruled the BLM violated FLPMA because the agency did not make a reasoned and informed decision for the Comb Wash Allotment in Utah, where the BLM had failed to make the decision at the RMP level. The BLM

failed to engage in any reasoned or informed decision making process concerning grazing in the canyons in the allotment. That process must show that BLM has balanced competing resource values to ensure that the public lands in the canyons are managed in the manner that will best meet the present and future needs of the American people.

228-6 | Id. at 101.

In the Lakeview RMP/EIS, the BLM has failed to demonstrate that the document presents a reasoned decision. For example, to make a reasoned decision and comply with FLPMA's multiple use mandate, the BLM should evaluate whether continuing grazing on at least the twenty-eight allotments in the "Improve" category is in fact best meeting the needs of the American people.³ The BLM must determine whether it is wise to continue grazing within the Summer Lake and Lake Abert Subbasins, which are rated as "low range integrity, low aquatic integrity, and low composite ecological integrity, RMP/EIS at A-11. The BLM must evaluate if it satisfies the multiple use mandate to continue livestock grazing in the many riparian pastures where riparian areas have been degraded by excessive grazing pressure and are no longer functioning at their full capacity. Id. at A-14. The BLM must also consider whether grazing should continue in riparian areas where it is causing and contributing to violations of water quality standards. See id. at A-212 ("[l]ivestock grazing can cause water temperature to increase"), A-213 ("[l]ivestock grazing can alter water quality by changing hydrologic conditions"). The BLM must evaluate whether grazing should continue on soils that are susceptible to erosion and shrinking or swelling, and where rangeland health is of high or moderate susceptibility to management-induced disturbance stresses due to aridity and soils. Id. at A-14. The BLM must evaluate whether grazing can continue on areas where it will degrade microbiotic crusts (see discussion below). For the BLM to comply with its multiple use mandate, the agency must assess in detail what is happening on the ground and make a reasoned decision whether grazing should continue.

³ The Christmas Lake allotment provides an enlightening example. The allotment contains the unique Lost Forest Research Natural Area; portions of the allotment are in unsatisfactory condition and cannot be healed through management strategies; the current range condition, level, or pattern of utilization may be unacceptable, and carrying capacity may be exceeded; livestock distribution and management is a resource conflict/concern; no forage is allocated for elk, insufficient forage is allocated for wild horses, and pronghorn habitat is in less than satisfactory condition; special status species habitats occur within the allotment, including greater sage-grouse; and the status of microbiotic crusts is unknown. RMP/EIS at A-41. Perhaps this particular piece of land, so important to sage grouse, elk, wild horses and containing the Lost Forest RNA should not be available to livestock grazing. Likewise, the Vinyard allotment presents a question of whether grazing is an appropriate use of this land where sage grouse and redband trout live; water quality is degraded by grazing; juniper encroachment, caused by grazing, is impacting watershed functions, wildlife habitat, quaking aspen/bitterbrush stands and ecological conditions; and noxious weeds are encroaching. Id. at A-43. These two allotments are merely examples of pieces of land where continued grazing is not going to contribute to best meeting the needs of the American people and the multiple use mandate.

228-6: The "Lakeview Grazing Management Final EIS" (USDI-BLM 1982a)

analyzed the impacts of livestock grazing and range improvement projects, vegetation allocation, reduced active preference, and implemented grazing management in the allotments within the planning area. Since the early 1990s, the BLM has completed evaluations or assessment on 62 percent of the planning area. Since 1982, the BLM has completed allotment evaluations or biological assessments on 26 allotments, encompassing 405,911 acres. The assessments did not identify that forage allocation was a problem; rather, the assessments indicated that changes in management were needed, such as the development of grazing systems for riparian areas. An additional 11 allotments have had evaluations/assessments and rangeland health grazing management guidelines assessments completed.

The BLM is in the process of assessing on-the-ground conditions and impacts of grazing on the remaining allotments through the rangeland health assessment process. Table 2-28a contains a summary of the assessments for rangeland health and grazing management guidelines completed in the planning area. The assessments completed represent 49 percent or 1,469,959 acres of the planning area. The objective of the rangeland health regulations (43 CFR 4180) are to promote healthy sustainable rangelands, accelerate restoration, and improve public rangelands to properly functioning condition. The five standards are the basis for assessing and monitoring range condition and trend.

The BLM completed an assessment and evaluation on the Christmas Lake Allotment (103) in 2001. Standard 1 was not met in some pastures consisting of native vegetation or nonnative seeding due to repeated use of certain pastures each spring or summer. The BLM has modified the grazing system to provide for rest for 2 years following grazing in the native pastures and in the nonnative seeded pastures; rest was incorporated into the system where none was previously scheduled. Standard 3 was not met on 8 percent (41,600 acres) of the allotment. The actions implemented to meet the standard are the same identified for Standard 1.

Further, a reasoned decision about grazing can only be made if the decision-maker is informed as to the benefits and consequences of grazing. The BLM has not assembled the information to understand the impacts of grazing or revealed that information in the RMP/EIS. The BLM fails to disclose the criteria, assessment, or determination of which acres are suitable for livestock grazing. Without this information, the BLM cannot claim that it has made an informed decision in the RMP/EIS and the agency ignores the multiple use and unnecessary and undue degradation mandates of FLPMA. The agency has spurned critically important scientific research where the science does not support the BLM's preferred alternative.⁴

Finally, the BLM cannot meet the FLPMA multiple use mandate—including the requirement to manage “without permanent impairment of the productivity of the land and the quality of the environment”—nor NEPA's requirements to evaluate environmental impacts, without evaluating the impacts on microbiotic crusts. The rangelands consist of vegetation and soils that are necessary to maintain the viability and sustainability of the entire ecosystem considered in the plan and beyond. Due to the varied and unique landscape and climate, healthy soil is integral for providing nutrients and water to the land and vegetation. Microbiotic crusts are a combination of lichens, mosses, green algae, fungi, and bacteria which grow on or just beneath the soils. See RMP/EIS at 2-19 to 2-20. These crusts are a major indicator of healthy rangelands. Microbiotic crusts stabilize the soil, fix nitrogen, increase soil fertility, increase the growth of higher plants, and increase water filtration into the soils. *Id.*

228-7

The RMP/EIS fails to discuss the condition or degradation of both the soils and the microbiotic crusts in the planning area. See *id.* Instead, the BLM states, in conclusory fashion and without any basis or support, that “[t]he LRA has very little microbiotic crust monitoring or research other than Ponzetti's few plots” and that “[s]pecies need to be collected, identified, curated, and mapped.” *Id.* at 2-20. The BLM then fails completely to evaluate the direct and cumulative environmental consequences of the preferred alternative on microbiotic crusts. *Id.* at 4-34 to 4-36. The RMP/EIS must evaluate the current status over the entire planning area of soils and crusts, give the causes of their degradation, and discuss concomitant losses of ecosystem function. Without this discussion, the RMP/EIS cannot be said to be an informed analysis under the multiple use mandate.

That the BLM has simply glossed over any serious consideration of the vital importance of microbiotic crusts in the arid-land ecosystems of the planning area is evident from the simple fact that microbiotic crusts are lumped in as a sub-category of soil in the “Affected Environment” section of the document. See *id.* at 2-19. Soil is “a natural body of mineral and organic matter that changes, or has changed, in response to climate and organisms.” S.W. BUOL ET AL., SOIL GENESIS AND CLASSIFICATION 11 (4th ed. 1997). The Soil Survey defines soil as

⁴ ONDA refers the BLM to the following important articles: A. Joy Belsky & Jonathan L. Gelbard, *Livestock Grazing and Weed Invasions in the Arid West*, Ore. Natural Desert Ass'n Scientific Report (2000) (attached); A.J. Belsky et al., *Survey of Livestock Influences on Stream and Riparian Ecosystems in the Western United States*, 54 J. SOIL AND WATER CONSERV. 419 (1999); A. Joy Belsky and Dana M. Blumenthal, *Effects of Livestock Grazing on Stand Dynamics and Soils in Upland Forests of the Interior West*, 11 CONSERV. BIOL. 315 (1997); A.J. Belsky, *Western Juniper Expansion: Is it A Threat to Arid Northwestern Ecosystems?*, 49 J. RANGE MGMT. 53 (1996).

The BLM completed an assessment and evaluation on the Vinyard Allotment (201) in 2001. All five standards were met. Livestock are not impacting water quality or riparian areas as they are excluded from Deep Creek. Trend data indicated an increase in juniper, which is impacting wildlife habitat; however, the exclusion of fire in the ecosystem was the contributing factor and not livestock grazing. The Draft RMP/EIS identifies vegetation treatments utilizing fire as a management tool to enhance wildlife habitat through reduction of juniper.

The water quality Standard 4 was not a factor or has been met in all 14 allotments completed to date. Microbiotic crusts are assessed under the ecological process, Standard 3. Copies of evaluations and assessments are available upon request. Also see response to comment 228-3 and 228-4.

228-7: Please see response to comments 228-3 and 228-6.

a natural body composed of solids (minerals and organic matter), liquid, and gases that occurs on the land surface, occupies space, and is characterized by one or both of the following: horizons, or layers, that are distinguishable from the initial materials as a result of additions, losses, transfers, and transformations of energy and matter *or* the ability to support rooted plants in a natural environment.

SOIL SURVEY STAFF, KEYS TO SOIL TAXONOMY 9 (8th ed. 1998) [hereinafter KEYS TO SOIL TAXONOMY], available at <http://www.statlab.iastate.edu/soils/nssc/> (modified Jan. 17 2002). Stated more in layperson's terms,

[t]he upper limit of soil is the boundary between soil and air, shallow water, live plants, or plant materials that have not begun to decompose. . . . The lower boundary that separates soil from the nonsoil underneath is [where] . . . soil grades . . . to hard rock or to earthy materials virtually devoid of animals, roots, or other marks of biological activity.

KEYS TO SOIL TAXONOMY at 9. Microbiotic crusts are not soil, are very much distinct from soil, and should be discussed at a level of detail equivalent to other ecosystem components. See, e.g., Tech. Ref. 1730-2, at 3-5, 7, 10 ("What Biological Soil Crusts are Not: Physical Soil Crusts").

The BLM itself has found that biological crusts have a "major influence on terrestrial ecosystems." Id. at 1. The BLM also has found that biological crusts are "ideal indicators of long-term environmental factors." Id. at 2; see also Handbook at III-3 (discussing indicators); RMP/EIS at 2-19 ("Biotic soil crusts show promise as indicators of rangeland health, and are increasingly being recognized as important components of arid and semiarid communities"). In order to meet the floor of FLPMA's "without permanent impairment" and "prevent unnecessary or undue degradation" mandates, the BLM must address soils and crusts in the RMP/EIS planning area. 43 U.S.C. § 1702(c); see also 43 C.F.R. § 1601.0-5(f) and 43 U.S.C. § 1712(c)(1). In addition, the BLM must strive to achieve healthy public lands. See generally 43 C.F.R. Subpart 4180; see also Manual at 1601.06.A.2 (land use plan decision will further this mission by identifying desired outcomes and actions that restore and maintain the health of the land).

In order to engage in a meaningful RMP process, and one that complies with statutes, regulations, and the BLM's internal guidance, the BLM must inventory for soils and crusts. See 43 C.F.R. § 1610.4-3 (requiring data and information collection with an eye to subsequent monitoring); Handbook at III-3. The BLM must assess the existing and collected information. See Manual at 1601.02B (evaluate resource information considering biological resources); Handbook at III-1 (discussing the differences among inventory, assessment and monitoring). The BLM must establish soil and biological crust condition goals and objectives to be attained. 43 C.F.R. § 1601.0-5(k)(3); id. § 4100.0-8; Manual at 1601.06.A.2 (desired outcomes); Handbook at II-1. Further, the BLM must establish program constraints and general management practices, including standards needed to achieve soil and biological crust condition goals and objectives. 43 C.F.R. § 1601.0-5(k)(4); id. § 4100.0-8; Handbook at II-2 to II-3; III-5 (defining standards to include "land health standards" and requiring the BLM to "identify how land health standards are to be considered in relationship to the management prescription for, and uses and activities occurring on, public lands" and discussing "allowable uses and actions to achieve desired

228-8

228-8: An ecological site inventory, which includes soil data, has been completed for the southern part of Lake County and western Harney County. The ecological site inventory for north Lake County is ongoing and will be completed in 2003. The north Lake County survey (which encompasses about half of the LRA) also includes baseline microbiotic crust inventories. Individual studies will be carried out on crusts for the remaining half of the LRA. This inventory process will be emphasized in the proposed ACEC's and during the individual allotment evaluations. This is discussed further in Appendix C.

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outcomes"). Finally, the BLM must provide for continued monitoring of biological crusts. 43 C.F.R. § 1610.4-3. Anything less than these steps renders the RMP process inadequate.

In short, the multiple use mandate in FLPMA includes clear language that the BLM cannot ignore. The definition of multiple use requires land managers to ensure "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment." 43 U.S.C. § 1702(c) (emphasis added). This is the bare minimum that the BLM must accomplish in the RMP/EIS. In addition, the BLM must prevent unnecessary or undue degradation of the lands. The Draft RMP/EIS satisfies neither mandate.

V. Failure to Include Objective, Numerical Standards

The RMP/EIS fails to provide meaningful objective, numerical standards for management of rangelands and their associated vegetative and soil resources. NEPA requires that resource management plans inform the public and decision makers how the resources will be managed in the future. Descriptions of these activities are called standards. Standards allow the public to determine whether the proposed management activities are effective, equitable, legal, and non-destructive. FLPMA land use planning also requires defined, actual standards as part of the BLM's program constraints and general management practices. See 43 C.F.R. § 1601.0-5(k)(4); id. § 4100.0-8; Handbook at II-2 to II-3; III-5 (defining standards to include "land health standards" and requiring the BLM to "identify how land health standards are to be considered in relationship to the management prescription for, and uses and activities occurring on, public lands" and discussing "allowable uses and actions to achieve desired outcomes").

Unbelievably, there are no numerical, objective standards for the management of rangelands, fire, soils, and other resources in the RMP/EIS. The RMP/EIS apparently relies instead upon fuzzy concepts such as "adaptive management," "desired range of conditions," and "best management practices" in lieu of imposing any objective accountability on its land management actions. See, e.g., RMP/EIS at 3-2 to 3-6. None of these concepts contain numerical, descriptive standards. The same is true of the "management direction" provided in the descriptions of alternatives. The following are a few typical "standards" from these sections:

A. "Management Directives"

- Livestock Grazing Management: Stating that the BLM will "[p]rotect and improve natural values while providing a sustained yield of an average of 108,234 AUM's [sic] per year of specified grazing use while maintaining resource values for multiple use and sustainability, consistent with resource objectives" is neither a standard nor a directive. RMP/EIS at 3-70. It tells the public nothing with respect to how the public lands will be managed. In fact, the only numerical standard included in this section is that forage utilization "would not exceed moderate (50 percent)." *Id.*
- Plant Communities: Stating that "[s]eedlings would be implemented with appropriate mixes of adapted native and nonnative perennial and annual plant species; although native species would be preferred for seedlings" likewise tells

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228-9

228-9: You are in error on this issue. Rangeland health standards and land health standards are discussed at the beginning of Chapter 3 under the "Rangeland Health and Health of the Land Strategies" section and in Appendix E4 of the Draft RMP/EIS. These standards have been built into the management goals and management actions prescribed for each resource under each alternative. Numerical standards guiding the management of particular resources are usually set at the activity plan level (such as in allotment management plans, water quality management plans, recreation area management plans, habitat management plans, or wild horse herd management area plans). The RMP sets broad management guidelines and does not necessarily set specific numerical standards.

A monitoring plan has been included as Appendix R. This plan describes how management objectives would be measured over the life of the plan.

228-10

228-10: The reference is to Alternative C, Chapter 3, under the Livestock Grazing Management section. Refer to comment response 228-9. In Chapter 3 under Wildlife and Wildlife Habitat, Management Goal 4, there is an objective identified for livestock utilization in deer and antelope winter range. BMP's are identified in Appendix D and are implemented as necessary, based on site-specific conditions, to meet water, soil, and watershed objectives for specific management actions. Additional BMP's may be identified during an interdisciplinary process when evaluating site-specific management actions. Finally, the Monitoring Plan (Appendix R) describes the purpose of the management goal and the types of monitoring information that will be collected to assess the effectiveness of livestock grazing management actions.

228-11

the public nothing. Id. at 3-41. What is meant by the terms “appropriate” and “preferred” means? Not only does this fail to provide any objective or numerical standard, but it even fails to provide basic criteria that serve as the basis of actual standards.

- Water Resources/Watershed Health: The RMP/EIS states that “[l]ivestock grazing would maintain minimum condition[s] of a healthy watershed which include mostly productive soils, native vegetation, and some biological crusts.” Id. at 3-56. Again, what do the terms “mostly” and “some” mean? How can the public assess the adequacy of these types of vague “standards” and how can land managers be expected to manage the public lands pursuant to these “standards”?

B. “Adaptive Management”

Adaptive management is poorly described and designed for failure. The plan frequently refers to adaptive management as the way most of the 3.2 million acres will be managed. Although the concept of adaptive management is well accepted because it provides flexibility and allows management to change as new information is discovered, it cannot, as in this plan, be substituted for real descriptions of management activities. The BLM has avoided writing true standards by stating that management will be changed if monitoring indicates it necessary.

Adaptive management requires that well developed and statistically valid monitoring programs be in place to identify the positive and negative effects of management. This requires that initial conditions be known and quantified; that a sufficient number of samples be taken to identify significant changes; that the results of different management activities be compared; that a reasonable timeline be established so that management can be changed before the resource degrades; that the data be evaluated in a timely fashion; and that management be changed when indicated.

228-13

The RMP/EIS does not provide for any of these factors. It simply suggests that resources will be monitored and changed. Adaptive management is effective but complex and expensive. It has to be well designed to withstand legal challenge. ONDA fears that the loose description of adaptive management in a plan that presents no standards, no description of monitoring activities, no timeline, and no requirement that management be changed will simply guarantee the BLM’s continuation with current activities. There is little in the RMP/EIS to indicate otherwise. As a result, ONDA asks that all harmful activities such as livestock grazing, OHV use, spring development, and so forth, be stopped until meaningful monitoring programs are in place.

C. “Best Management Practices”

228-14

The Draft RMP/EIS also purports to describe “best management practices” (BMPs) in order to comply with law and regulation, including the Clean Water Act. 33 U.S.C. §§ 1251–1387. However, the BMPs listed for livestock grazing management are nothing more than lip service to adaptive management. See RMP/EIS at A-35. The BLM does not even attempt to describe the BMPs; nor does it demonstrate that implementation of BMPs will result in compliance with water quality standards and other applicable law.

228-11: The term *appropriate* references microbial crusts and native plant species. On an experimental basis, specific sites would be selected for inoculation that would enhance the probability of a successful reintroduction in an attempt to establish microdiversity. Seed mixtures for plantings and rehabilitation of burned areas would emphasize the use of native species first, but would also use nonnative species that are adapted to site conditions to ensure optimum success of establishment.

Data from ecological site inventories would be used to identify the potential vegetation for a given site. That information is taken into account when deciding which native plant seed would be used. The history of the area is also studied to determine if that potential vegetation has a chance of being established under current site conditions. The appropriate mix may not be available, and alternative seeds may need to be used. There are sites where experience has shown that only nonnative perennial species are capable of establishing and, therefore, are needed to limit cheatgrass and noxious weed invasion. See Table L2-1 in Appendix L of the Draft RMP/EIS for potential lists of native seed mixtures for rehabilitation.

228-12: Please refer to response to comment 25-2.

228-13: A monitoring plan has been included as Appendix R. Monitoring is a key component of adaptive management. This monitoring plan will also be part of the approved RMP/ROD.

228-14: Please see response to comment 218-27.

The "desired range of conditions" applies to all alternatives and is apparently supposed to set standards for land, resource, and social/economic conditions that will be achieved under this plan on the scale of twenty to fifty years. RMP/EIS at 3-3. These descriptions are vague and, for the most part, unhelpful to the public in assessing the adequacy of the plan. Again, this section uses language such as: "Upland soils have sufficient vegetation cover to minimize accelerated soil erosion. Physical and chemical soil properties are adequate for vegetation growth and hydrologic function appropriate to the specific soil type, landform, and climate." *Id.* at 3-4. Without numeric, objective standards, it is anyone's guess what these terms mean and how, if at all, these "standards" will be achieved or enforced.

E. Recommendations for Objective, Numerical Standards

1. Upland Rangeland Community Standards.

(Derived from Desired Range of Future Conditions for Alternative 4, ICBEMP DEIS, Chapter 3, pp. 29-35)

In dry grass potential vegetation group, 60-80% of the area is dominated by large native perennial bunchgrasses and forbs without conifer and shrub encroachment. (See "meeting standard" below.)

In dry shrub potential vegetation group, 50-70% of the area in this group is dominated by large native perennial bunchgrasses and forbs with an open shrub canopy; 10-25% is dominated by native bunchgrass and forbs communities without shrubs. (See "meeting standard" below.)

In cool shrub potential vegetation group, 60-80% of the area is dominated by large native perennial bunchgrasses and forbs with an open shrub canopy; 15-40% contains mixtures of perennial bunchgrasses and forbs without shrubs. (See "meeting standard" below.)

Meeting Standard: If community or allotment is meeting standard, continue present management. If not meeting standard, determine if adequate progress is being made toward meeting the standard. "Adequate" progress is defined as progress that is detectable at a statistical significance level of $P < 0.15$. If progress is not adequate, adjust grazing management (see "substandards", below).

Substandards: If progress towards standards is not adequate, grazing during grass-stem elongation (boot to flower) should occur no more frequently than once out of any three consecutive years and utilization should not exceed 30% at any time. If these criteria do not lead to improvement within five years, than grazing during stem elongation will be eliminated. If there is still no progress (within three years), than area shall be closed to grazing.

228-15: Please see response to comment 228-9. ICBEMP objectives and standards were proposed at the large, basin scale, and are not necessarily appropriate at the subbasin or finer scales, such as an RMP.

Standards During Droughts: If water-year precipitation falls to <70% of average annual precipitation by start of, or during, authorized period of grazing, then area will be closed to grazing. If water-year precipitation falls to <85% average for three consecutive years, then area will be closed to grazing.

2. Riparian Community Standards.

(Derived from Oregon, Washington, and Idaho's criteria used for listing waterbodies as CWA § 303(d) water quality limited, and CRITFC Technical Report 94-4, Dec. 1994, by J.J. Rhodes, D.A. McCullough, and F.A. Espinosa, Jr. For greater explanation of the following standards, see Rhodes et al., 1994.)

Standard #1: Surface fine sediment levels must on average be <20%, sediment delivery must average <20% over natural, and cobble embeddedness must average <30%; 90% of streambanks must be stable; temperatures must be <64°F (<56°F during times of salmon spawning and fry emergence); and existing state and federal water quality standards for toxics, turbidity, nutrients, dissolved oxygen, and other parameters must be met.

Meeting Standard. If stream is meeting standards, continue present management. If not meeting standards, on-going activities that cause the problems will be suspended and no new activities initiated until conditions meet standards or a statistically significant (p<0.10) improving trend over at least 5 years is documented through monitoring and total sediment delivery from anthropogenic sources is <20% over natural.

Standard #2: Livestock will be restricted from access to spawning reaches during and after the spawning season.

Standard #3: Grazing will be eliminated from environments where it is clearly incompatible with protection of aquatic resources. (For example, grazing in wet meadows with fine-grained, non-cohesive soils and little woody bank vegetation almost always leads to stream damage.)

Standard #4: After degraded conditions have improved to the standards discussed in Standard #1 above, grazing must be tightly controlled and closely monitored. If monitoring shows that conditions are beginning to deteriorate (at a significance level of p<0.4), then grazing must be reduced or eliminated. (See Rhodes et al., 1994 for discussion of significance levels.)

VI. Failure to Comply with the Standards and Guidelines

228-16

228-16: Please see responses to comments 228-5 and 228-9.

Related to the failure of the RMP/EIS to provide meaningful objective and numerical standards for management of rangelands and their associated vegetative and soil resources, is a failure to comply with the Standards for Rangeland Health and the Guidelines for Livestock Grazing Management ("Standards & Guidelines") and the BLM's Land Use Planning Manual and Handbook.

The BLM adopted its "Fundamentals of Rangeland Health" (FRH) regulations, 43 C.F.R. Subpart 4180, in 1995 to establish ecological criteria for the management of BLM grazing lands. The FRH regulations establish four "fundamentals of rangeland health" that all BLM grazing allotments must meet, or show significant progress toward meeting, relating to water quality, riparian habitat, watershed conditions, ecological processes, and species habitat. See 43 C.F.R. §§ 4180.1-4180.2. The FRH regulations provide for evaluation of whether those criteria are being met through application of FRH Standards and Guidelines. Oregon (and Washington) adopted its Standards and Guidelines in 1997. See Standards For Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the States of Oregon and Washington, August 12, 1997.

Whenever the BLM determines that ecological conditions on an allotment or pasture are not meeting the FRH Fundamentals or the Standards and Guidelines due to grazing impacts, the FRH regulations expressly require that the BLM must revise grazing management "as soon as practicable, but not later than the start of the next grazing year." 43 C.F.R. § 4180.2(c). See also *id.* § 4180.1 (same). The BLM must adopt changes in livestock numbers, seasons of use, or other terms and conditions that "will result in significant progress toward fulfillment of" the FRH Standards and Guidelines. See *id.* §§ 4180.1, 4180.2(c). The Ninth Circuit Court of Appeals has held that this is a mandatory and legally enforceable duty, requiring the BLM "not merely to begin the procedures set forth in 43 C.F.R. §§ 4110 [consult with affected parties], 4120 [issue a proposed decision], 4130 [consider any protests], and 4160 [turn the proposed decision into a final decision], but rather to complete them and issue its final decision by the start of the next grazing year." *Idaho Watersheds Project v. Hahn*, 187 F.3d 1035, 1037 (9th Cir. 1999). The "plain language of the regulations requires taking action that results in progress toward fulfillment of ecological standards and guidelines by the start of the next grazing year." *Id.*

228-17

The BLM adopted the FRH regulations pursuant to its statutory authority under FLPMA and other statutes. As such, the BLM must insure that its resource management plans adhere to the regulations the agency itself has established. The RMP/EIS fails to satisfy the strictures of the FRH Standards and Guidelines because the plan neglects to apply these mandatory Standards and Guidelines to those allotments that are currently in unsatisfactory condition. Twenty-nine (of 120 total) allotments within the planning area are designated by the BLM as "improve" management category allotments. See RMP/EIS at 2-41 to 2-44, and App. E. Grazing allotments designated under the "improve" category are managed to improve "current unsatisfactory resource conditions" and are to receive the highest priority for funding and management actions. *Id.* at 2-45. Despite the fact that these allotments are currently in unsatisfactory condition, the RMP/EIS states that existing forage allocations would be maintained until analysis or evaluation through the adaptive management process identifies a need for adjustments. *Id.* at 2-38 to 2-40. Moreover, a number of other allotments besides the Improve allotments have identified resource conflicts or concerns. See *id.* at App. E. For example, how can the BLM justify maintaining existing forage allocation levels when so many allotments have no forage allocated to elk or bighorn sheep? See *id.* Decisions to allocate forage for species other than domestic livestock must be made once these conflicts are identified, not at some unspecified point in the future under the umbrella of "adaptive management." That is, the problem has already been identified—now is the time to "adaptively manage" to correct these resource conflicts. The BLM

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228-17: Please see responses to comments 216-1, 228-5, and 228-9.

Forage allocations were coordinated with ODFW, who felt that providing forage for wildlife would not conflict with existing livestock use. When the Draft RMP/EIS was printed, newly assigned forage allocations for deer, elk, pronghorn, and bighorn sheep were mistakenly listed in the Other Wildlife column in Appendix E. These allocations have been placed in their proper locations in the Proposed RMP/Final EIS.

Wildlife AUM's are presented as a comparison to highlight changes in wildlife use patterns or population levels in certain allotments. Using AUM's to document wildlife use is a confusing concept due to the fact that there are dietary and habitat differences between many wildlife species and cattle. For example, bighorn sheep and cattle may have similar diets and may use the same allotment, but bighorn sheep use is concentrated on steep rocky slopes that are inaccessible to cattle. In this example, even though AUM's for wildlife and cattle exist in the same allotment, there is little overlap in actual AUM use or competition for forage. Any conflicts that arise from grazing would be addressed on a case-by-case basis in individual allotment management plans.

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must satisfy the Standards and Guidelines requirements by taking affirmative steps to achieve the standards and conform to the guidelines.

Where ongoing livestock grazing is a "significant factor" for failure to meet the requisite standards, the BLM should remove livestock or significantly curtail grazing on that portion of an allotment. See Sol. Memo at 5 (recognizing that "[l]ivestock grazing may be reduced or eliminated on BLM-managed land when necessary or appropriate to protect other values, or where rangeland health standards are not being met"). "Improve"-designated allotments are an example in the Plan of an instance where livestock grazing is a "significant factor" for failure to achieve standards. The BLM's instruction memorandum, issued by its Assistant Director for Renewable Resources and Planning on April 10, 1998, states, "43 C.F.R. subpart 4180 was written to achieve positive, on-the-ground changes in resource conditions. . . . Success will be measured in terms of concrete outcomes." See *Idaho Watersheds Project*, 187 F.3d at 1037. Simply monitoring status quo grazing practices under the rubric of "adaptive management" is not "appropriate action" that will cause "significant progress" toward actually achieving the standards.

Finally, the BLM's complete capitulation of mandatory and objective standards in the RMP/EIS violates its own Manual and Handbook. The BLM must establish program constraints and general management practices, including standards needed to achieve soil and biological crust condition goals and objectives. 43 C.F.R. § 1601.0-5(k)(4); *id.* § 4100.0-8; Handbook at II-2 to II-3; III-5 (defining standards to include "land health standards" and requiring the BLM to "identify how land health standards are to be considered in relationship to the management prescription for, and uses and activities occurring on, public lands" and discussing "allowable uses and actions to achieve desired outcomes").

VII. Violation of the Executive Order on Invasive Species

The RMP/EIS violates the Executive Order on Invasive Species, Exec. Order No. 13,112 (Feb. 3, 1999), by proposing to authorize and carry out an action that is likely to cause or promote the introduction or spread of invasive plant species, without making a determination that the benefits of such action outweigh the potential costs.

The Executive Order states that agencies whose actions may affect the status of invasive species shall

- (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them.

The BLM is in compliance with guidance provided in 43 CFR 4180, which states "... the authorized officer shall take appropriate action . . . as soon as practicable but no later than the start of the next grazing season upon determining that existing grazing management needs to be modified . . ." Appropriate actions to meet standards may include, but are not limited to, changing the season of use, excluding livestock from specific areas, reducing livestock numbers, or implementing rotational grazing systems, to provide periodic rest from grazing. Table 2-28a is a summary of the assessments for rangeland health and grazing management guidelines completed to date in the planning area. The BLM implemented appropriate actions where a standard was not met prior to the next grazing season in conformance with the regulation.

Id. § 2(2). Further, the agency must not “authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species” unless the agency has “determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species *Id.* § 2(3). The agency must also insure “all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.” *Id.*

228-18

By proposing to allow livestock grazing on 92.5% of the planning area, RMP/EIS at S-6, and close only 0.4% of the public lands within the planning area to off-highway vehicle use, *id.* at S-8, the BLM would be in violation of the Order. The RMP/EIS therefore does not prevent introduction of invasive species and it does not provide for restoration of native species and habitat conditions in already-invaded ecosystems. In addition, the RMP/EIS fails to make the required determination that the benefits of the preferred alternative outweigh the costs with respect to the spread of invasive species on the public lands. In fact, the RMP/EIS fails to mention the Executive Order in the discussion of noxious weeds. *Id.* at 2-14 to 2-16, 3-52.

The RMP/EIS admits that “[n]oxious weed invasion contributes to the loss of rangeland productivity, increased soil erosion, reduced species and structural diversity, loss of wildlife habitat, and in some instances, is hazardous to human health and welfare.” *Id.* at 2-14. As well, the BLM should know by now that the main reason for the spread of weeds in forests and rangelands across the arid West is livestock grazing and trampling. See A. Joy Belsky & Jonathan L. Gelbard, “Livestock Grazing and Weed Invasions in the Arid West,” *Ore. Nat. Desert Ass’n Scientific Report* (2000) (attached). Yet, the RMP/EIS provides no real discussion of the reasons for the spread of invasive species within the planning area, nor any indication that the benefits of specific proposed actions that directly affect the spread of invasive species (such as grazing 92.5% of the planning area and closing only 0.4% of the planning area to off-highway vehicles) outweigh the costs of those actions. The management alternatives section of the RMP/EIS only discusses methods of weed control involving mechanical and manual control methods such as burning, biological controls such as the release of insects or pathogens, and chemical treatments such as application of herbicides. RMP/EIS at 3-52. The document completely fails, however, to suggest that reduced livestock grazing is an acceptable method in reducing the spread of noxious weeds. *Id.* In fact, this is certainly the best method to control the spread of weeds on the public lands. That it is not even considered is nothing short of a violation of law, not to mention sound science and land management.

VIII. Violations of Water Quality Standards

228-19

The RMP/EIS fails to provide for compliance with water quality standards by referring only to potential future water quality restoration plans and potential future implementations of “adaptive management strategy,” rather than providing for objective standards with definite triggers and responses to water quality problems. RMP/EIS at A-204 to A-208.

Section 303 of the Clean Water Act addresses water quality via water quality standards, which specify the appropriate uses of water bodies and set standards to protect those uses. 33 U.S.C. § 1313; 40 C.F.R. §§ 130.3, 131.2. Implementation of water quality standards requires states to place those waters not meeting water quality standards on the 303(d) list. 33 U.S.C. §

228-18: The Executive order states that the agency must ensure “... all reasonable and prudent measures to minimize risk of harm will be taken in conjunction with the actions.” The BLM has interpreted this to mean that all projects or activities which could introduce or spread weeds have an element of consideration for weed management. All projects and new permits have weed abatement and prevention stipulations, and education efforts are ongoing in the local communities and at recreation areas to educate the visiting public. It is not reasonable to target cattle as primary vectors of weed spread when wildlife, birds, and people spread them as well. The weed program is focused on all sources of surface disturbance or seed spread that might result in weed introduction or spread, including wildfires. To the extent that the Bureau must meet multiple use objectives or existing rights for access, our strategies are not aimed at excluding uses, but controlling activities and providing for mitigation measures, which would control any infestations and restore or move plant communities to the desired future condition. That is part of the reason for emphasizing the use of native species, where such use is expected to be successful.

The RMP does not specifically mention that reduced livestock grazing is an acceptable method in reducing the spread of noxious weeds. However, it is implied in the document in that any activity that results in ground disturbance would increase the likelihood for weeds to be introduced and established, and that reductions in ground-disturbing activity would have a positive effect. This would include reduced livestock grazing. Mitigation for impacts from livestock grazing and motorized vehicle travel are presented in Chapter 4.

The BLM is currently preparing a national vegetation management plan and environmental impact statement, which should provide additional data, analyses, and decisions to allow a more comprehensive inter-state approach to this serious problem. The BLM agrees that the Executive order requires careful consideration of discretionary actions by land managing agencies. However, the spread of weeds and other invasive species is not limited to livestock and OHV’s on public lands—the seeds are spread by wind, water, wildlife, wild horses, highway travel, and various forms of nonmotorized recreation. Although most of the LRA is well-blocked, many of the roads must be kept open to allow access to private inholdings and utility facilities, to conduct management actions including fire suppression and weed control, and to provide for search and rescue and other authorized activities.

1313(d)(1)(A)-(B) (requiring states to "identify those waters for which the effluent limitations required by section [303(b)(1)(A)] and section [303(b)(1)(B)] . . . are not stringent enough to implement any water quality standard applicable to such waters"). States must then calculate total maximum daily loads (TMDLs) for those waters not meeting water quality standards. *Id.* § 1313(d)(1)(C); 40 C.F.R. § 130.7. Although the BLM appears to understand its place in the TMDL process, see RMP/EIS at 3-57, it fails to understand that its adaptive management approach to listed water bodies without approved TMDLs is likely to lead to continuous violations of the CWA.

The RMP/EIS acknowledges that the primary cause of water quality degradation on the public lands is pollution from nonpoint sources. RMP/EIS at A-205. The evidence linking livestock grazing to riparian degradation and water quality problems is overwhelming and conclusive. *See id.* at A-212 to A-213 (detrimental impacts of livestock grazing to temperature, sediment, and turbidity); Table 2-17, at 2-26 (water quality limited streams). *See also* Or. Dep't of Envtl. Quality, Water Quality Program (2001), at <http://www.deq.state.or.us/wq> (water quality limited streams and supporting data for listing). By authorizing AUMs and allowing for issuance of grazing permits for grazing allotments adjacent to water quality limited streams, limited solely by adaptive management techniques, the RMP/EIS violates the CWA's requirement that federal agencies must adhere to state water quality standards to the same extent as nongovernmental entities. 33 U.S.C. § 1313(a) (referring to federal agencies "engaged in any activity resulting, or which may result, in the discharge or runoff of pollutants"). This also violates FLPMA. *See* 43 U.S.C. § 1712(c)(8) (in the development of land use plans, the Secretary shall "provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans"). Finally, Standard 4 of the BLM's Standards and Guidelines states, "Surface water and groundwater quality, influenced by agency actions, complies with State water quality standards." Standards For Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the States of Oregon and Washington, August 12, 1997. *See also* 43 C.F.R. § 4180.1(c).

The plan's non-specific, non-immediate promise to address water quality standards violations at some later date fails to comply with the mandatory nature of the requirements of CWA section 313 and FLPMA section 202. The BLM must actually satisfy water quality standards and must actually insure that it does not engage in any activity (including issuance of federal grazing permits) that may result in runoff of pollutants into water quality limited streams.

IX. Proposed Off-Highway Vehicle Use Violates NEPA and FLPMA

The RMP/EIS fails to address an adequate range of alternatives with respect to off-highway vehicle (OHV) use, fails to manage OHVs pursuant to FLPMA's principles of multiple use and in accordance with FLPMA's requirement to prevent unnecessary and undue degradation of the public lands, and fails to conform to Executive Orders 11,644, 11,989, the BLM's "National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands," and the BLM's OHV regulations.

The proposed plan would continue the majority of traditional uses that are permitted, funded, or otherwise authorized on the public lands while aggressively working with state and local weed boards, ranchers, and other interested parties to reduce or halt the spread of invasive species. This would be an integrated approach, combining a variety of tools to identify, isolate, treat, and monitor invasive plant populations. Public education and appropriate terms and conditions on Bureau authorized activities would be part of the program to comply with the Executive order and related laws at both the Federal, state, and local levels. While only a small part of the resource area is completely closed to vehicle use under the preferred Alternative D, 44 percent is limited to existing or designated roads and trails (see Table 4-5). This helps to limit the spread of weeds by vehicles.

228-19: The BLM is working to determine compliance with Oregon water quality standards, especially the water temperature standard. ODEQ comments on the RMP reflect a strategy of work to be done to make this determination.

The BLM would define the range of desired conditions for the riparian conservation areas, focusing on potential natural vegetation, stream geomorphology, and soil condition. This would be used in the development of the total maximum daily loads and subsequent water quality management plans (in cooperation with ODEQ and USFWS).

228-20: Please see response to comment 228-19.

As discussed above with respect to livestock grazing, NEPA requires agencies to analyze a reasonable range of alternatives. 42 U.S.C. §§ 4332(2)(C)(iii), 4332(2)(E). See also *Cal. v. Block*, 690 F.2d 735 (9th Cir. 1982) (even where agency's decision criteria were diverse, resulting alternatives were not where none allocated more than 33% of planning area to wilderness in roadless review EIS). The alternatives considered in the RMP/EIS consider the following acreages with respect to acres within the planning area closed to OHV use: Alternative A—8543 acres (0.3% of the planning area); Alternative B—8543 (0.3%); Alternative C—40,507 (1.3%); Alternative D—11,202 (0.5%); Alternative E—0 acres (0.0%). RMP/EIS at 4-128.⁵ In short, the RMP/EIS considers no alternative that closes more than 1.3% of the public lands within the planning area to OHV use. On its face, this is a clear violation of NEPA's requirement to analyze a reasonable range of alternatives; the violation is amplified by the fact that the BLM has acknowledged a sharp rise in OHV use on public lands in recent years and expects this trend to continue. Bureau of Land Mgmt., "National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands," 1-3 (January 19, 2001). In the midst of this unprecedented rise in OHV use on public lands, it is short-sighted to essentially recommend business as usual by maintaining most of the acreage in the Lakeview planning area designated as "open" and unrestricted to OHVs.

The RMP/EIS notes that OHV use occurs "within [special management areas] and critical or important wildlife habitats, cultural sites, and plant sites. Some of this use is inappropriate or damaging to these special/sensitive areas and resource values." RMP/EIS at 2-83 to 2-84. However, the BLM fails entirely to discuss the impacts of OHVs on soils (from erosion, compaction and so forth), vegetation, and soil crusts. See *id.* Rather, the preferred alternative simply turns a blind eye to the significant impacts from OHV use and sticks with the status quo by closing less than one half of one percent of the planning area. See *id.* at 4-129.

This also violates FLPMA's requirement to manage the public lands consistent with the "principles of multiple use and sustained yield," 43 U.S.C. §§ 1732(a), 1702(c), and FLPMA's requirement to "prevent unnecessary or undue degradation" of the public lands. *Id.* § 1732(b). See discussion *supra*. It is difficult to comprehend how closing less than one percent of the public lands in eastern Oregon's high desert to unrestricted OHV use can amount to "multiple use" or prevention of unnecessary or undue degradation.

Moreover—and beyond mere percentages—the BLM must present inventories and evaluations that provide evidence that OHVs do or do not damage ecosystems and specific ecosystem components such as soils, microbial crusts, fish and wildlife, and native vegetation. Unless and until the BLM provides this information, the public lands should be closed to OHV use unless specifically designated as open. This policy is embraced in Executive Order 11,644 (Feb. 8, 1972), as amended. Section 9 of that Executive Order states, "Each respective agency head is authorized to adopt the policy that portion of the public lands within his jurisdiction shall

⁵ The acreages of the planning area open (unrestricted) to OHV use are: Alternative A—2,510,908 acres (79.4% of the planning area); Alternative B—2,507,474 acres (79.3%); Alternative C—0 acres (0%); Alternative D—2,038,044 acres (64.5%); Alternative E—0 acres (0%). RMP/EIS at 4-128. This also presents an inadequate range of alternatives, failing to provide any middle ground between two extremes. Further, even if this is considered a slightly more equally distributed range of alternatives, this fails to mitigate for the unreasonable range of alternatives with respect to closed acres.

228-21: The RMP does consider a reasonable range of alternatives with respect to OHV designations. Your assertion focuses only on the open and closed designations while ignoring the limited designations (limited to both existing and designated roads and trails). Under each of the limited designations, cross-country travel is prohibited. Additionally, under the limited to designated roads and trails designations, a number of miles of specific roads are proposed for closure (refer to Table 4-4 and Maps SMA-5 to SMA-32). In response to public and internal comments, additional lands were included in the limited to existing roads and trails category in the Proposed RMP/Final EIS (refer to Map R-7). When looking at the combinations of proposed closed and limited designations across all alternatives, it is apparent that a reasonable range of alternatives were considered. Please refer also to Table 4-5.

228-22: The potential impacts from OHV use to SMA's, critical or important habitats, cultural sites, and plant sites have been addressed under the preferred Alternative D, by retaining designation of 4 ACEC's and proposing designation of 12 new ACEC's (9 of which are proposed as RNA's (refer to Tables 3-3, 3-5, and 4-4, and Maps R-7, SMA-4 to SMA-32). Impacts of OHV uses on soils, vegetation, special status plants, riparian areas, cultural resources, and watersheds are discussed in various sections of Chapter 4 of the Proposed RMP/Final EIS.

be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use." In addition, the BLM's regulations require that areas designated as open to OHV use "shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability." 43 C.F.R. § 8342.1(a) (emphasis added). Similarly, areas open to OHV use must minimize harassment of wildlife and disruption of wildlife habitats and minimize conflicts with other recreational users of the public lands. Id. § 8342.1(b), (c). In short, the cursory treatment of OHV use in the RMP/EIS, coupled with a lack of information on OHVs' impacts to the resource values of the public lands within the planning area, falls short of the BLM's statutory and regulatory requirements. Without a reasoned analysis of the affected environment, the alternatives, and multiple use management, the RMP/EIS is inadequate with respect to OHV use.

X. Wilderness Re-Inventory and WSA Analysis

The RMP/EIS arbitrarily refuses to re-analyze the suitability of non-recommended wilderness study areas (WSAs) for wilderness designation, despite FLPMA's requirement of continuing inventory of the public lands and despite new or changed circumstances since the 1989 Oregon Wilderness Final EIS. In addition, the RMP/EIS fails to adequately protect WSAs from adverse impacts from livestock grazing, off-highway vehicles, and actions on lands adjacent to WSAs.

FLPMA requires the BLM to "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values)." 43 U.S.C. § 1711(a) (emphasis added). The "inventory shall be kept current so as to reflect changes in condition and to identify new and emerging resource and other values." Id. (emphasis added). See also 43 C.F.R. § 1610.4-3 (requiring District or Area Manager to "arrange for resource, environmental, social, economic and institutional data and information to be collected" and stating that "[i]nventory data and information shall be collected in a manner that aids application in the planning process, including subsequent monitoring requirements"); Public Rangelands Improvement Act, 43 U.S.C. §§ 1901-1908, 1903(a) (Secretary "shall update, develop (where necessary) and maintain on a continuing basis thereafter, an inventory of range conditions and record of trends of range conditions on the public rangelands") (emphasis added). FLPMA requires the land use planning process that the RMP/EIS has been developed under to rely upon the inventory of the public lands required under FLPMA section 201(a). Id. § 1712(c)(4). Further, FLPMA's wilderness study requirements also reference the inventory requirement of section 201(a). Id. § 1782(a) (referring to lands "identified during the inventory required by section 1711(a) of this title as having [wilderness] characteristics"). See also BLM Wilderness Inventory Handbook, H-6310-1, 4 (requiring the BLM the "prepare and maintain on a continuing basis an inventory of certain public lands to determine the presence or absence of wilderness characteristics").

There are fifteen WSAs covering 486,873 acres of public land within the planning area. RMP/EIS at 2-54. Twelve of these WSAs were recommended by the BLM for congressional designation as wilderness. Id. at 2-51, 1-7 to 1-8 (citing "Oregon Wilderness Final EIS" (1989) and "Wilderness Study Report for Oregon" (1991)). There are currently no congressionally-designated wilderness areas within the planning area. The 1989 Oregon Wilderness EIS and the

In the RMP/EIS, the BLM has apparently taken the position that this resource management planning process is not the proper venue to re-assess the suitability of non-recommended WSAs from the 1989 Wilderness EIS. The BLM appears to have limited its discussion of wilderness to the question of designation and/or release of WSAs; the RMP/EIS does not address a re-inventory of existing WSAs. In response to this issue being raised during review of the Draft Southeastern Oregon Resource Management Plan (SEORMP), the BLM stated: "A global reinventory by BLM to address wilderness values within the planning area is outside the scope of this plan. In accordance with FLPMA, with substantial public input and review, BLM has completed its required evaluation and assessment of wilderness values on public lands with earlier planning efforts." Proposed SEORMP, Vol. 3, at 105 (emphasis added). This statement directly contradicts with FLPMA's mandate that the BLM conduct an inventory of the public lands and their resources, and use that inventory in its wilderness study efforts, "on a continuing basis." 43 U.S.C. § 1711(a) (emphasis added). The BLM's analysis of its duties under FLPMA is flawed: completion of one inventory and wilderness recommendation document in thirty-five years in no way constitutes a "continuing" inventory and analysis. The word "continuing" in the BLM's statutory mandate necessarily means that the process is never complete. The Lakeview BLM would be wise not to follow the erroneous and unlawful route of its colleagues to the east.

While the BLM may argue that recommended WSAs submitted by the President to Congress in 1991 need not be re-inventoried (because they remain "on the table" for Congress to act upon), this assumption runs counter to FLPMA and is particularly erroneous with respect to WSA acreages not so recommended in the 1989 and 1991 documents. By virtue of the BLM's failure to continue to inventory these lands with respect to their wilderness suitability, the RMP/EIS fails to disclose any changes in the characteristics and wilderness suitability of those non-recommended areas that may have occurred in the past ten-plus years. The BLM's own Land Use Planning Handbook states:

New information, updated analysis, or new resource use or protection proposals may require amending or revising land use plans and updating implementation decision. The primary requirements for considering new information are as follows: 1. The BLM planning regulations require evaluating whether there is new data of significance to the land use plan (see 43 CFR 1610.5-5) or revisions (see 43 CFR 1610.5-6) are required. . . . New data or information can include, but is not limited to . . . [p]ublic comment or staff assessments indicating that new information or changed circumstances warrant a reconsideration of the appropriate mix of uses on particular tracts of public lands . . . [and] information from the public or others regarding conditions or uses of resources on public lands.

Handbook, VI-I to VI-II. See also IM 2001-075 at 2 ("BLM does have the authority, under section 202 of FLPMA, to designate new WSAs, which can be adjacent to existing section 603 WSAs In deciding whether to do so, the BLM may rely upon existing WSA information to

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228-23: A recommendation on the suitability for wilderness designation of each WSA was arrived at only after a lengthy and methodical national process that involved numerous opportunities for public involvement. The decision that the wilderness review and study required by section 603 of FLPMA was a one-time review and not subject to reconsideration regarding suitability of WSA's for wilderness designation was not arbitrary, and conforms to long-standing BLM policy. As stated in 1982 by the Associate Solicitor, Energy and Resources, "It is our opinion that the specific directive of 603 is for a one-time review of lands with wilderness characteristics based on the initial inventory of lands conducted by BLM." (memorandum dated March 16, 1982, to Director, BLM from Associate Solicitor, Energy and Resources "Wilderness Review of Lands Placed Under BLM Administration after October 21, 1976," at 4). Once WSA boundaries are established, they may not be revised except under very narrow circumstances and if specifically approved by the Director or Secretary (memorandum dated August 4, 1982, from Associate Solicitor, Energy and Resources to Legislative Counsel, "Where the Secretary of the Director, BLM Has Authority to make Minor Boundary Adjustments to Wilderness Study Areas").

The wilderness review study, required by section 603 of FLPMA, was conducted statewide, and the BLM is obligated to protect documented wilderness values in all WSA's until Congress acts on the BLM's wilderness recommendations. The BLM does not have the prerogative to change recommendations for wilderness suitability on WSA's inventoried under section 603. A statewide wilderness inventory documenting the presence or absence of wilderness values in all roadless areas was completed in a timely manner, with a final decision issued in November 1980 ("Wilderness Inventory Decisions, November, 1980"). A *Federal Register* notice published July 8, 1982 (47[131]: 29805-7) listed all WSA decisions in Oregon. A final BLM Oregon statewide legislative wilderness environmental impact statement was published in December 1989 (USDI-BLM 1989a), with a record of decision signed by the Secretary of Interior in October 1991 (USDI-BLM 1991a). This record of decision included the wilderness suitability recommendations of the Secretary of Interior to the President on each of the WSA's identified in the wilderness inventory. The President then introduced wilderness legislation into Congress in July 1992. With the exception of the "Steens Mountain Cooperative Management and Protection Act" (Public Law 106-399) of October 2000 and the "Oregon Resources Conservation Act" (Public Law 104-208) in September 1996 (in which two small WSA's were designated wilderness and transferred to the USFWS), Congress has not yet acted on the statewide wilderness recommendations.

the extent that it remains accurate. But the BLM may not refuse to consider credible new information which suggests that . . . public lands within the planning area . . . have wilderness characteristics and are suitable for management as [WSAs].” (emphasis added); Sol. Memo at 6 (same).

228-24

There are several significant questions surrounding the BLM’s refusal to reconsider non-recommended WSA acres in the RMP/EIS. For example, the BLM recommended zero of 16,440 acres in the Sand Dunes WSA, with the rationale that long-standing public acceptance of OHV use would require an extensive commitment of personnel and resources to alter management of the area. RMP/EIS, Vol. 2, at A-254. There is no discussion or public interest balancing against the fact that this area is thought to be the largest inland moving sand dune system in Oregon, if not the Pacific Northwest; or that the “opportunity for primitive recreation in the WSA is outstanding.” *Id.* Similarly, the BLM recommended zero of 141,410 acres in the Basque Hills WSA (half of which are in the Lakeview District), with the rationale of allowing for “intensive range developments,” power line construction within a utility corridor across the WSA, and implementation of a wildlife habitat improvement project. However, there is no indication whether the range projects, the power line, or the wildlife habitat project were ever built or even remain a possibility. In short, ONDA and the general public have no idea how many instances of new information and changed circumstances exist with respect to non-recommended wilderness areas, because the RMP/EIS fails to discuss this critical issue.

This not only violates FLPMA and federal regulations, but it also violates NEPA’s policy of full public disclosure of the significant environmental impacts, affected environment, reasonable alternatives, and changed circumstances. 40 C.F.R. § 1500.1(b) (requiring “that environmental information is available to public officials and citizens before decisions are made and before action is taken”); *id.* § 1502.1 (an EIS “shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment”). See also *id.* § 1506.6 (public involvement); *id.* § 1501.7(a)(1) (public participation in scoping); *id.* § 1502.9(c) (requiring agency to prepare supplements to draft or final EISs if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989) (NEPA “ensures that the agency . . . will have available, and will carefully consider, detailed information concerning significant environmental impacts; it also guarantees that the relevant information will be made available to the larger [public] audience.”); *Blue Mtns. Biodiversity Project*, 161 F.3d at 1212 (agency analysis must be “fully informed and well-considered”).

XI. Consultation Under the Endangered Species Act

ONDA also notes that the BLM will need to consult on the Lakeview RMP action, pursuant to the requirements of Section 7 of the Endangered Species Act (ESA). 16 U.S.C. §§ 1531–1544, 1536. Such consultation must occur before a decision is made and any modifications of the selected alternative must be disclosed to the public and the public given an opportunity to comment on the modifications, in accordance with NEPA. The U.S. Fish and Wildlife Service

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228-25

Current policy in the BLM’s “Wilderness Inventory and Study Procedures” handbook (USDI-BLM 2001g) provides the public the opportunity to submit new information at any time on lands which may have wilderness characteristics. The BLM will review any new information and documentation received to determine whether the conclusion reached in previous BLM inventories (that the area in question lacked wilderness characteristics) remains valid, or whether the area in question may have wilderness characteristics. Such requests must be accompanied with a map showing specific boundaries of the area(s) in question, photos, and a detailed narrative that documents how current information significantly differs from the information in prior inventories regarding the wilderness values of the area(s). However, there has been no new data or information generated internally by the staff or received from the public to date, indicating a need to reassess the suitability of nonrecommended WSA’s or other areas. If, in the future, such information was presented and found worthy of consideration, a plan amendment or revision could be prepared to formally recommend such an area(s) as wilderness under section 202 of FLPMA.

Areas recommended unsuitable for designation as wilderness (from the previous statewide inventory) are currently managed according to the wilderness IMP (USDI-BLM 1995b) until such times as Congress acts to either designate the area as wilderness or releases them for other purposes.

228-24: There has been no new data or information generated internally by the staff or received from the public, indicating a need to reassess the suitability of the Sand Dunes WSA. The criteria considered in developing the unsuitable recommendation and rationale in the “Wilderness Study Report” (USDI-BLM 1991a) have not changed. In the Basque Hills WSA, the power company which originally proposed the utility corridor has withdrawn its proposal for this line. Most of the livestock developments and wildlife habitat projects described in the “Wilderness Study Report” and associated EIS (USDI-BLM 1989a, 1991a) have not been constructed due to the constraints of the wilderness IMP (USDI-BLM 1995b), but would still be beneficial for wildlife and livestock management if the area is released from wilderness study.

228-25: The BLM has had several information-sharing meetings and contacts with the USFWS, initiating Section 7 Consultation on this plan. This is documented in the planning file. These meetings were designed to solicit comments on the plan to ensure that their concerns were addressed prior to completion of the Proposed RMP/Final EIS. Once the Proposed RMP/Final EIS is published, formal consultation will be completed with the USFWS on the effects of the preferred Alternative D on listed species. The BLM will not issue an approved RMP/ROD without a biological opinion. The consultation cannot be completed until a proposed decision is developed to allow the USFWS to review effects of a specific action, rather than the full range of alternatives, each of which would have different levels of potential effects.

(FWS) will not, however, be able to make a no jeopardy determination, because the RMP does not contain any standards.

XII. Designation of Wild and Scenic River Miles

Finally, ONDA urges the BLM to recommend all 22.8 miles eligible for designation as wild and scenic rivers. RMP/EIS at Table 2-35. In a landscape as remarkable as that of the Lakeview planning area, it is unbelievable that no rivers are so designated or listed in the Nationwide Rivers Inventory. *Id.* at 2-52. The BLM admits in its preferred alternative that designation as part of the national wild and scenic rivers system would ensure long-term protection of outstandingly remarkable values, especially in light of potential changes in management, land status, or other laws (for example, delisting of the Warner sucker under the Endangered Species Act). *Id.* at 4-102 to 4-104. Interestingly, however, the BLM then asserts elsewhere in the same section that current levels of protection of key outstandingly remarkable values provided by other laws and management designations, such as the ESA or wilderness study areas, are sufficient for the time being. See *id.* at 4-102 to 4-103. Instead of banking on other laws providing protection to individual values, the BLM should employ the Wild and Scenic Rivers Act in order to protect and enhance an entire "suite" of outstandingly remarkable values under one comprehensive management plan. Furthermore, the BLM should be aware that the standards and schemes of protection are different in the various laws at issue. The WSRA has the advantage of allowing development of a comprehensive management scheme that will endure beyond future changes in land and species status under other laws.

XIII. Recommendations

Please consider adopting the following recommendations in the Lakeview RMP/EIS:

1. All rangelands in poor or fair condition shall be withdrawn from livestock grazing until they have developed an adequate herbaceous layer and a healthy microbiotic crust.
2. All rangelands in excellent condition shall be permanently withdrawn from livestock grazing to allow baseline conditions to be studied and to act as a genetic reservoir of native species that are necessary for future reintroductions into degraded rangelands of the region.
3. All Temporary Non-Renewable permits shall be permanently withdrawn.
4. Rangelands shall only be replanted with native species.
5. Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause the destruction of microbiotic crust or retard the restoration of microbiotic crust.
6. Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause or contribute to the spread of invasive weeds.
7. Whenever adequate monitoring is not carried out, or evaluation of the monitoring cannot take place within a year of data collection, then livestock grazing must be immediately terminated pending completion of monitoring and evaluation.
8. Fires shall not be fought in WSAs or special management areas.
9. Prescribed burning shall occur in the summer, when wildfires normally occur.

Comments on Lakeview Draft RMP/EIS

- 22 -

If no significant changes are made to the proposed decision (preferred Alternative D in the Proposed RMP/Final EIS) in order to meet terms and conditions of the formal consultation prior to publishing the approved RMP/ROD, no additional NEPA review would be required. Due to the preconsultation activities that have been completed to date, no significant change is anticipated. The USFWS has not expressed a concern over the current level of standard description. Consultation will be completed on the plan, but project level consultation will also be needed as specific actions are implemented.

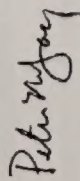
228-26: Paraphrasing and combining excerpts from individual suitability determinations regarding whether or not to recommend designation of eligible streams as part of the National Wild and Scenic River System provides a rationale which is taken completely out of context. Suitability determinations for each of the three streams stand alone and are analyzed within a range of alternatives in the RMP planning process. As part of the suitability evaluation and determination process, existing and potential mechanisms which provide protection of the identified outstandingly remarkable values are considered, along with the protection provided by potential designation in the National Wild and Scenic River System. The suitability evaluation and determination process undertaken for Guano Creek, Honey Creek, and Twelvemile Creek provides a thorough examination of the factors which must be considered in making the determination as to whether or not to recommend eligible river segments for inclusion in the National Wild and Scenic River System.

10. Bulldozers and other large equipment that has the ability to disturb the soil and cause new invasions of weeds shall be avoided during fire fighting unless property or human lives are at stake.
11. Burned areas must be rested from livestock grazing and other activities for at least ten years following a fire.
12. Livestock grazing will be allowed only where it has been found to be suitable and the lands chiefly valuable for livestock grazing.
13. No grazing shall be allowed in Special Management Areas.
14. True standards having a definite time line shall be incorporated.

CONCLUSION

Thank you for the opportunity to comment on this resource management plan and for your consideration of ONDA's and NEDC's comments. If you have any questions regarding these comments, please contact me at the address provided below. Please send a copy of the Proposed RMP and Final EIS to Mac Lacy (address below) and Bill Marlett, ONDA 16 NW Kansas, Bend, OR 97701, as well as NEDC.

Sincerely,



Peter M. Lacy ("Mac")
Staff Attorney
Oregon Natural Desert Association
732 SW Third Avenue, Suite 405
Portland, OR 97204
503.525.0193
lacy@onda.org

Mark Riskedahl, President
Northwest Environmental Defense Center
10015 SW Terwilliger Blvd.
Portland, OR 97219

Doug Heiken, Wildland Advocate
Oregon Natural Resources Council
P.O. Box 11648
Eugene, OR 97440

Cc: Bill Marlett
Oregon Natural Desert Association

Encl.

Comments on Lakeview Draft RMP/EIS
- 23 -

January 31, 2002

Bureau of Land Management
c/o Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Subject: Draft Lakeview Resource Area Management Plan

Dear Mr. Sykes,

Although I'm a resident of Washington State, I've been visiting the High Desert in Oregon for many years. I'm a member of the Oregon Natural Desert Association. I've fished the streams and rivers and I've walked many miles all over the eastern side of the Cascades in Oregon. I can tell you that I've seen first-hand the damage to the land caused by ORVs and of course, cows on the open range.

Thus, I am asking that the BLM choose Alternative C of the Draft Lakeview Resource Area Management Plan.

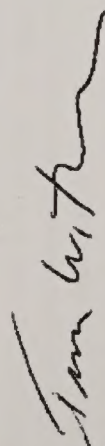
We need to protect our public lands from the destruction that ORVs cause in the cryptobiotic crust. We all know how fragile the desert environment is. In addition, as I understand it, Alternative C would close all roads in riparian areas, reduce grazing, eliminating it from riparian areas entirely and add 20,000 acres to four existing ACECs, while adding 130,000 acres to 12 new ACECs. The big thing, though, is that all cross country travel on ORVs would be prohibited. Finally, ORVs under Alternative C would be prohibited from The Sand Dunes WSA and the Lost Forest ACEC. Because of ORVs, it's a mess over there and it needs to get reined in.

I hope the BLM chooses Alternative C. Let's preserve our public lands in the amazing Oregon High Desert.

Please put me on your mailing list. I am very interested in the outcome of the Plan and what choices are made.

Thank you,

Tim Withee
1201 12th St. NE
Auburn, WA 98002
253.288.2291



L-229

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Sykes,

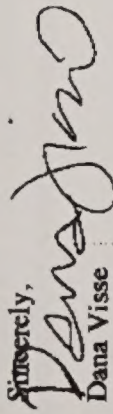
I would like to take this opportunity to comment on the Lakeview Resource Area Management Plan. I would like to urge the BLM to choose Alternative C.

The Oregon High Desert contains many ecosystems with endemic, threatened, and endangered species susceptible to the negative consequences off-road vehicle use, overgrazing, mining, and non-native species invasion. Many of these critical areas such as the Owyhee Canyons or the Badlands are not yet protected through permanent wilderness designation. Please make policy considerations such as Alternative C that limit the harm of these threats while maintaining the ecological integrity of wild desert lands.

I would like to make some specific requests. Please limit ORV use across the Lakeview Resource Area. Exclude ORV use from the Sand Dunes Wilderness Study Area and Lost Forest Area of Critical Environmental Concern. Close roads in riparian areas and in Special Management Areas. Prohibit grazing in sensitive riparian zones and reduce grazing across the board by at least 20%. Designate remaining river miles eligible for Wild and Scenic status and manage accordingly. Alternative C is a start.

Desert lands provide visitors with a sense of solitude and connection vital to living in today's hectic and capricious world. As the manager of our public lands, please protect desert wild lands within a context of long term vision, not short term, private interest gain. These remaining wild places are essential to the hope for a more sustainable future, something we are drastically short on these days.

Sincerely,


Dana Visse

1405 SE Clinton St.
Portland, OR 97202

Dwayne Sykes
RMP Team Leader
Lakeview District
HC 10 Box 337
Lakeview, OR 97630

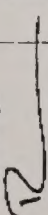
Dear Mr. Sykes,

I would like to take this opportunity to comment on the Lakeview Resource Area Management Plan. Please choose Alternative C. It is a good start.

Specific goals would be to limit ORV use across Lakeview Resource Area. Protect the Lost Forest and Sand Dunes Wilderness Study Area from ORVs. Close roads in Special Management Areas. Finally, if you can't eliminate grazing, please reduce it radically in riparian areas.

Desert wild lands are important to me. Please pay attention to the need to help protect these great places.

Sincerely,


Richard Wilhelm
2226 12th Ave.
Portland, OR 972



January 23, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Dear Sir:

Please follow the wise and proven parameters of multiple use when making any decisions concerning public lands. Specifically the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Ask only one thing; protect the public lands for the public not from the public. Do not bow to the environmental extremist and their quest to reserve all public lands for the wealthy and the physically able.

Thank you,

Leon Wilbanks
2003 78th Ave SE
Salem, OR 97301

From: lkiel@sunvalley.net
Date: Mon, 28 Jan 2002 14:02:32 -0800 (PST)
Subject: Adopt a New & Improved Alternative C

Dear Mr. Sykes:

Thank you for the opportunity to offer comments on the Draft Lakeview Resource Management Plan/Environmental Impact Statement.

Alternative D is not acceptable as the preferred alternative. It fails to satisfy the Lakeview RMP,s stated intent to adhere to ecosystem management principles. Further, Alternative D does not reduce livestock grazing levels despite the RMP,s acknowledgement that cattle grazing causes resource damage, and it leaves the overwhelming majority of the planning area open to damage by off-road vehicles.

A strengthened and improved Alternative C could be expected to improve the condition of the Lakeview area. Alternative C comes much closer to meeting the Lakeview RMP,s goals and objectives by excluding livestock from all riparian areas, designating zero acres as "open" to cross-country off-road vehicle use, recommending all 22.8 eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern and designating twelve new ACECs, and limiting energy and mineral extraction throughout the planning area. It's worth noting that other BLM field offices have confined OHV's to existing roads and trails to protect the resource from cross-country use.

Please add the following resource protection to safeguard these 3.2 million acres of public lands: exclude livestock grazing and off-road vehicle use from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, all ACECs and Wilderness Study Areas, and grazing allotments that are not meeting management objectives.

In addition, this RMP must include objective standards and guidelines so that its success over the next two decades can be adequately gauged.

Finally, I urge you to take this opportunity to update the BLM,s wilderness recommendations for the Lakeview Resource Area (LRA). Five of the 14 Wilderness Study Areas found within the LRA were recommended by the BLM as non-suitable for wilderness in 1989. In each of these five cases, the rationale provided in the Oregon Wilderness Final EIS for a non-suitable recommendation was based on potential or planned projects such as geothermal exploration, mineral development, intensive range projects, and powerline construction that may or may not remain viable, or desirable, 15 years after the original wilderness inventory was conducted. The Lakeview RMP process is the most appropriate venue for reviewing and updating this information in an effort to determine if the BLM,s current wilderness recommendations are still valid.

Thank you very much for your time and consideration of my comments and concerns.

Liam Kincannon
Box 482
Sun Valley, ID 83353

From: max@lrapa.org
Date: Wed, 30 Jan 2002 07:51:33 -0800 (PST)
Subject: Adopt a New & Improved Alternative C

Dear Mr. Sykes:

Thank you for the opportunity to offer comments on the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Please consider these comments as the Lakeview BLM District Office prepares its final RMP/EIS for the Lakeview Resource Area.

It is my understanding that the BLM has chosen Alternative D as its preferred alternative. Unfortunately, this option fails to satisfy the Lakeview RMP's stated intent to adhere to ecosystem management principles. Further, Alternative D does not reduce livestock grazing levels by a single Animal Unit Month (despite the RMP's acknowledgment that cattle grazing causes resource damage), and it leaves the overwhelming majority of the planning area open to destructive off-road vehicles.

I urge you to reject Alternative D, and choose instead a strengthened and improved Alternative C. Alternative C comes much closer to meeting the Lakeview RMP's goals and objectives by excluding livestock from all riparian areas, designating zero acres as open to cross-country off-road vehicle use, recommending all 22.8 eligible river miles for Wild and Scenic River status, expanding four existing Areas of Critical Environmental Concern and designating twelve new ACECs, and limiting energy and mineral extraction throughout the planning area.

Alternative C is heads and shoulders above the BLM's preferred alternative, but it still needs improvement. To offer true resource protection, and to safeguard these 3.2 million acres of public lands, the BLM should choose a strengthened Alternative C that excludes livestock grazing and off-road vehicle use from proposed Wild and Scenic Rivers, critical fish and wildlife habitat, sage grouse leks, all ACECs and Wilderness Study Areas, and grazing allotments that are not meeting management objectives.

In addition, this RMP must include objective standards and guidelines so that its success over the next two decades can be adequately gauged. Reliance on adaptive management may only lead to further resource damage, as BLM lacks the staff and funding to perform the constant monitoring that adaptive management requires.

Finally, I urge you to take this once-in-twenty-years opportunity to update the BLM's wilderness recommendations for the Lakeview Resource Area (LRA). Five of the 14 Wilderness Study Areas found within the LRA were recommended by the BLM as non-suitable for wilderness in 1989. In each of these five cases, the rationale provided in the Oregon Wilderness Final EIS for a non-suitable recommendation was based on potential or planned projects such as geothermal exploration, mineral development, intensive range projects, and powerline construction that may or may not remain viable, or desirable, 15 years after the original wilderness inventory was conducted. The Lakeview RMP process is the most appropriate venue for reviewing and updating this information in an

Letters 234 through 242 were faxed as one document. Since all letters were virtually verbatim, only 234 will be reprinted. Other letters were from: Max Huefle (234); Jim Steitz (235); Brent Fenty (236); Mha Anna S. Khalsa (237); Christie Dunn (238); Keene Huefle (239); Barb Potter (240); and Derrick Knowles (241).

effort to determine if the BLM's current wilderness recommendations are still valid.

Thank you very much for your time and consideration of my comments and concerns.

Max Hneftle
428 n 5th
Springfield, OR 97477



SIERRA
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FOUNDED 1892

Juniper Group
OREGON CHAPTER SIERRA CLUB
16 NW Kansas Ave, Bend, OR 97701

LAKEVIEW DRAFT RMP/EIS COMMENTS 2002 4 - 83

LAKEVIEW BLM
FEB - 4 2002
January 30, 2002

Attention: Dwayne Sykes BLM- Lakeview District Office
HC10 Box 337
Lakeview OR 97630
Fax: (541) 947-6399

The Juniper Group Sierra Club welcomes this opportunity to comment on the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Please accept these comments and place them in the permanent file for the Lakeview RMP/EIS. Our members have long held a personal interest in the health of all the ecosystems on the Lakeview District, where several of our Executive Committee members have spent years on the ground, exploring, working and recreating from Hawks Valley to the Devil's Garden. We are pleased to see action considered that would help the lands under review in the Lakeview Resource Area recover from grazing abuse and see an opportunity for meaningful ecological recovery. However, we have questions regarding this RMP/EIS that need to be answered before we can feel comfortable that the appropriate management alternatives are being presented and up for selection.

We support this open process of comment and review by groups such as the Sierra Club, which represent an interested public willing to participate in the exchange of comment and opinion in the interest of seeing that our concerns regarding the management direction of the "Preferred Alternative" are addressed.

The following is excerpted from the opening paragraphs of the Sierra Club Conservation Policy on Federal Public Lands Grazing:

"The primary goal of this Sierra Club federal public lands grazing policy is to protect and restore native biodiversity and achieve functional and self-sustaining ecosystems. The Sierra Club recognizes that the preponderance of scientific evidence documents that grazing by non-native species has led to severe and sometimes irreversible degradation of native ecosystems. Federal public lands belong to the American public and must be managed to maintain their long-term ecological integrity. In order to achieve our objectives, the Sierra Club advocates significant changes to current land management practices to correct the problem."

The Lakeview Resource Management Plan team is to be applauded for adopting an overarching goal "to develop management practices that ensure long-term sustainability of a healthy and productive landscape." (page 1-1) They are to be further praised for developing an alternative (Alternative C) that, with a few exceptions, has the potential to accomplish this vital goal. Unfortunately the alternative chosen as the "preferred alternative" (Alternative D) cannot accomplish the stated goal and will perpetuate the dismal failures of past management. We will show how the stated goal cannot be attained under Alternative D, and will make suggestions for improving the alternative we recommend, Alternative C. The RMP/EIS identifies 5 comprehensive issues to be addressed (pages 1-4 to 6), and we have organized our comments around these issues.

1/8

One Earth, One Chance
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243-1

BLM intends to use "adaptive management" to meet the goals and objectives of this RMP. "Adaptive management" is described as "a continuous process of planning, implementing, monitoring, evaluating, and incorporating new information into strategies..." However, it is clear by past experience that BLM does not have the financial or human resources necessary to accomplish any aspect of adaptive management on a continuous basis. Even the RMP doesn't pretend to incorporate adaptive management throughout most of its content. For example, BLM plans to evaluate each grazing allotment only once over a 10-year period to see if they meet the standards for rangeland condition (page 2-40)-a far cry from "continuous" planning, implementing, monitoring and evaluating. This seems even more outrageous given the record of allotment evaluations listed in Table 2-26, where 34 allotments are listed as having an allotment evaluation within the past 10 years. Given this track record, the average interval for evaluation will be once every 35.3 years!

243-2

The RMP would be less duplicitous if it were to make a realistic estimate for the full cost of implementing adaptive management as applicable to each alternative. This cost should be calculated and prominently shown. When weighed against the income from the total annual grazing fees of \$146,116 (4-115), it will be clear that the costs of grazing in most or all of the planning area far outweigh the benefits.

243-3

Issue 1. What areas should be designated and managed as special management areas? The January 2001 Federal Register issued a directive to the Bureau of Land Management regarding public input on roadless areas. This directive mandates BLM to consider any "new information" that a roadless area meets the definition for wilderness. Our organization is actively inventorying all roadless lands and will supply documentation to the BLM for consideration. BLM should be prepared to accommodate for additional WSA designation and management within the next 5 years, and should address this in the RMP.

Also addressed under Issue 1 is "How should the Lost Forest/Sand Dunes/Fossil Lake existing ACEC be managed?" The preferred alternative allows for the continuation of out-of-control ORV use on the Sand Dunes Wilderness Study Area. This irresponsible activity will continue to damage important cultural and paleontological resources that occur throughout the area. Recent studies have revealed that current vehicle use is causing destruction of artifacts and fossil remains. It has also negatively impacted natural resources in the area. Enforcement of existing regulations in the area has been lax to nonexistent in the face of increasing transgressions. Furthermore, off-road traffic has increased dramatically since the area was designated a WSA (likely violating interim management policy for Wilderness Study Areas), and is likely to increase in the foreseeable future. Lawsuits will no doubt be forthcoming if cultural resource damage and increasing off-road vehicle use persists. The only affordable and practical way of meeting the RMP goal of "ensuring long-term sustainability of a healthy and productive landscape" in the Sand Dunes is to exclude off-road vehicle use in this special area.

All 17 miles of Honey Creek, and 6 miles of Twelvemile Creek should be recommended as suitable for inclusion in the national wild and scenic river system. The benefits to T & E species as well as the opportunity to bring these Clean Water Act 303(d) listed waters into "Wild and Scenic" status would be a significant step forward in improving management practices on such important aquatic habitats and will also help achieve recovery objectives and criteria for T & E species within these watersheds.

2/8

243-1: The BLM is required by the grazing regulations (43 CFR 4110.3) to periodically review the permitted use specified in a grazing permit and make changes to manage, maintain, or improve rangeland productivity. Sixty-two percent of the planning area has been evaluated and management changes implemented. The BLM has completed allotment evaluations or biological assessments on 36 allotments beginning in the early 1990s totaling 405,911 acres. Table 2-28a contains a summary of the assessments for rangeland health and grazing management guidelines completed in the planning area since 1998. The assessments represent 49 percent or 1,469,959 acres of the planning area. The assessment process will continue through 2008, at which time the entire planning area will be completed. The BLM will continue to monitor all I and M category allotments on a yearly basis (see Appendix R). Monitoring would serve as the basis for future changes in management using adaptive management principles.

243-2: An integral part of adaptive management is monitoring. Field monitoring is carried out by resource specialists as part of the normal and routine jobs for which they get paid. The BLM often hires seasonal workers to conduct field monitoring. If monitoring shows that objectives are not being met, management would change or adapted to move towards meeting those objectives. While it would certainly be possible to determine the cost of monitoring, monitoring activities are not subjected to a cost-benefit analysis. Some commercial uses of the public lands, such as oil and gas leasing, bring in considerable amounts of money to the U.S. Treasury; however, the administration of the some resource programs cost more than the fees collected. Some of these monitoring costs would occur even if commodity production ceased as described under Alternative E.

The type of benefit cost analysis proposed in this comment is not appropriate or informative within the context of the land use planning. Each alternative represents a package of goals and objectives to guide future land management actions, and grazing management is only one component of the entire package. Many of the desired outcomes are not financial in nature, but have to do with resource condition improvement. Grazing fee collections is one of many funding sources used by the BLM to implement management actions. To clarify the distribution of grazing fee collections between the U.S. Treasury, states, counties, and BLM range improvement project funding, additional text has been added to Chapter 2.

243-3: Refer to comment response 228-23.

Issue 2. *How can upland ecosystems be managed and restored to achieve desired range of conditions?* Livestock grazing management is a key component of whether or not upland ecosystems will be restored. The RMP claims that problems pertaining to livestock grazing are not related to existing forage allocations (2-38), but provides no evidence to support the statement. We hereby request whatever evidence and data that the BLM has to back up the statement. This is an important matter, because the concept is used to justify continued destructive levels of forage allocation in the face of poor range condition. Many problems from existing over-allocation are well known and well documented. These problems include competition with wildlife, depletion of fire-carrying capacity, soil erosion, noxious weed invasion, and juniper encroachment due to the lack of fire carrying capacity because of overgrazing by livestock.

ICBEMB evaluation of the four subbasins on the LRA is not pretty. The ICBEMP review found that the ecological integrity ratings of rangeland, aquatic and composite categories are rated low in two of the four subbasins on the LRA, and moderate in the other two subbasins (A-11). One of the primary risks to ecological integrity listed is the sensitivity of the upland range ("dry shrubland potential vegetation group") to overgrazing. Despite the bad ratings, the RMP team states "grazing has been well-managed," and "there are few areas, including riparian areas that would be considered to be overgrazed." (A-13) The low ecological integrity ratings don't seem to agree with the BLM's assessment. We suggest that a history of overgrazing, coupled with increased in stocking levels over the past 10 years (2-45) are dominant factors that have contributed to the current situation. The preferred Alternative D does nothing to reverse these trends by reducing livestock numbers, and even the more restoration-oriented Alternative C only proposes to reduce current AUM stocking levels to early 1990's numbers. We recommend that further reductions in allocated AUM's be considered in both alternatives. We recommend non-renewal & AUM reductions for all allotments that are not in satisfactory condition and reductions in allotments in other areas as outlined in previous sections of these comments.

The RMP identifies 28 allotments in the "I" category, managed to improve current unsatisfactory resource conditions..." (2-45). These 28 allotments account for 2,107,178 out of a total 3,027,890 acres allotted for livestock grazing on the LRA (2-26). Stated another way, 67% OF THE TOTAL ACREAGE considered in this RMP is listed under the "I" category. See attached map (composite of G-1 and W-1 with "I" category allotments highlighted). It is not surprising that the most degraded of these areas will receive the highest priority for funding and management actions. We recommend that the funding go toward real ecological restoration instead of the following planned actions: "maintain or improve vigor of crested wheatgrass seedings," "improve upland watershed and ecological condition by vegetative treatment, including seeding," "continue to manage for forage production in seeded areas," "continue livestock management practices under the previous allotment management plan," "installation of livestock management facilities," "establish monitoring sites to research livestock effects," and "providing water [for livestock] and other ideas." These actions will not improve ecological conditions and will be costly. Priority funding cannot, in practice, be implemented for all the programs suggested for the 2+ million acres (more than 2/3rds of the management area) that will qualify under the "I" category. No mention is made of which various proposed programs will receive priority funding, but it should.

The RMP notes that 12 allotments within the planning area have been assessed under the Rangeland Health and Grazing Management Guidelines (2-40). Information is missing such as how many standards were not attained in these allotments, or what (if anything) was identified as contributing to those non-attainments except for a single case where livestock were identified. However, we must be skeptical that evaluations were objective considering that: "assessments are a cursory form of evaluation," they depend on "funds and workforce available to conduct the measurements or observations," they are conducted "with participation from permittees," and they were developed in consultation with resource advisory councils and provincial advisory

243-4: Refer to comment response 228-5.

The BLM disagrees that, "many problems from existing over-allocation are well-known and well-documented." The commentor provides no specific data or other information on where such problems occur within the planning area.

Table 2-4 presents proper functioning condition data on the 85 miles of streams in the planning area. Seventy-five percent are in proper functioning condition, which meets the BLM's national standard. Of this, 49 miles are excluded from livestock grazing and an additional 28 miles have livestock grazing management in place. Ecological site inventory data collection and analysis will be completed for the planning area by 2003. This information is, and will continue to be, utilized to assess whether the rangeland health standards are being met. Simply removing livestock will not always result in improved resource conditions. Copies of evaluations and assessments are available upon request.

243-5: The broad-scale information from ICBEMP provides a general characterization of the subbasins within the planning area, but in many cases used inappropriate assumptions or inaccurate data. The subbasins consist of about 20 percent forest and 80 percent rangeland. Rangelands were inherently categorized as having low integrity. Resource conditions for rangeland in the planning area are actually better than described by ICBEMP for the four subbasins in the planning area. The reasons for this are described in the "Summary of the Analysis of the Management Situation" (USDI-BLM 2000b). This document includes a summary of the subbasin review process which examined the validity of the ICBEMP findings. Also see response to comment 243-4.

243-6: Please see response to comment 216-1.

243-7: Please see responses to comment 228-5 and 243-1.

3/8

committees composed largely of ranchers (A-178 to 185). We request that all future assessments include an ecologist and be open to public participation and review. We also request that documentation be provided to the Juiper Group Sierra Club on which allotments were selected for assessment, the procedures and protocols used to assess each allotment and the results of each assessment.

Of the 130 Sage Grouse leks shown on map W-1, 87 are found on (I) Category allotments. On page A-229, it states that reductions in Sage-Grouse on the LRA are indicative of general declines throughout the west. This amounts to a 30% decline over the past 30 years, which is hardly a sustainable population trend. This is even more significant given the fact that Sage-Grouse are widely recognized as a keystone species, indicative of the overall health of the range. Poor range condition is largely a result of livestock grazing on public lands and livestock should be removed from allotments where Sage Grouse are known to breed and nest.

We suggest BLM seriously consider permanent removal of livestock from areas now in unsatisfactory condition. We also suggest that BLM permanently remove livestock from all of the following areas:

- + Sage-Grouse leks and important Sage-Grouse habitat (i.e., mating, brood-rearing areas)
- + Areas of Critical Environmental Concern (ACECs)
- + Wilderness Study Areas (WSAs)
- + Grazing allotments rated as (I) Improve category
- + Grazing allotments documented as not meeting Standard 5 for T & E species

Removing livestock from these areas would actually be much more cost effective and would in addition help attain the RMP goal of ensuring long-term sustainability of a healthy and productive landscape.

Noxious weeds represent a serious threat to upland ecological integrity. Their spread is likely to result in irreversible rangeland deterioration. Preventing their introduction should be given top priority, but has not been addressed at all in the RMP. Key preventative measures are ignored under all alternatives. Although detection and eradication are important, as proposed in Alternative C, "zero tolerance" does not get to the root causes of noxious weed establishment. Use of herbicides to eradicate noxious weeds brings along its own set of ecological problems. Primary causes of noxious weed introduction and spread include land surface disturbance (from hooves, vehicles, and vegetative treatments), transportation from infected areas (livestock feed and vehicles), and infected grass seedings. The preferred alternative (Alternative D) does not include measures sufficient to prevent or stop noxious weed invasion. Noxious weeds will continue to spread and landscape productivity and health will continue to decline as a result. Leaving the problem for future RMP's to deal with will be both foolish and costly.

Issue 3. How can riparian areas and wetlands be managed to protect and restore their natural functions? The answer to this question is quite elementary when the causes of their dysfunction are examined. Detrimental uses include "livestock grazing, logging, mining, road construction, and OHV use (1-5). Keep these activities away from the stream and they will recover. Allow these activities to persist (as they are in the preferred alternative), and full recovery will never occur. The RMP claims it will meet CWA responsibilities by providing "assurance that 303(d)-listed waterbodies will contribute to the maintenance or restoration of water quality." (2-24). The word "maintenance" should be omitted from the sentence. Otherwise the statement seems to suggest that water pollution may be *maintained*, surely contradictory to CWA responsibilities. The whole purpose of the Clean Water Act is to see to it that pollution is cleaned up, not *maintained*. The RMP should ensure that measures will be taken to restore CWA water quality standards within a reasonable time frame (e.g. 5-10 years). Instead, it weakly promises to work toward "measurable improvement" of polluted water, and no time frame is given at all. The stated RMP goal of

4/8

243-8: Prevention and management of noxious weeds is addressed extensively in Chapter 3, Management Common to Alternatives A through D section. Specific actions for Alternatives C and D, including expanded inventory and eradication efforts and restoration of sites, are addressed. Specific preventative measures are addressed in Chapter 4 as mitigation for reducing the risk of introduction and establishment across management actions. The effects of weed introduction and spread caused by other programs are analyzed in other sections of Chapter 4.

Herbicides are not the only method used to control or eradicate weeds in the resource area. Herbicides are one tool of many within an integrated weed management program.

243-9: The text has been changed to reflect your concern. Also see the response to comment 228-19.

The BLM would continue to implement the 303(d) Protocol for waters included on the State's 303(d) list of affected waters. The BLM would develop water quality restoration plans that include protective and restorative measures to achieve and ensure compliance with State water quality standards. However, the

ensuring long-term sustainability of a healthy and productive landscape will not occur unless BLM gets serious about attaining water quality standards within a stated time interval. We recommend that livestock grazing be excluded from riparian habitats. Water quality standards can not be met merely by "implementing or maintaining grazing systems that promote the recovery or maintenance of riparian systems to the desired range of conditions based on site potential" as proposed in Alternative D.

Under Alternative D, livestock grazing will be managed "to maintain minimum conditions of a healthy watershed" (3-17). This statement is very confusing. Considering that ICBEMP ratings for rangeland and aquatic are "low" for ecological integrity over most of the range, and not "high" in any of the region, we can only reach the conclusion that "minimum conditions of a healthy watershed" are not present. This begs the question of what the RMP team defines as "minimum conditions of a healthy watershed." How can these conditions be *maintained* if they do not exist? A healthy watershed must be *restored* before it can be maintained. If the definition for "minimum conditions" have already been met, then they are not good enough and another standard needs to be used if the RMP is to meet its goal of ensuring long-term sustainability of a healthy and productive landscape. Even Alternative C's proposal to "manage livestock to promote a healthy watershed" is too weak. We would suggest that both alternatives manage livestock to *restore* (not merely promote) a healthy watershed that will result in a ICBEMP rating of "high" aquatic and rangeland ecological integrity throughout the planning area within a specified time period. Objectives and goals for riparian and stream condition, as well as for all special status plant and animal species need to be established and documented for each allotment. We also recommend elimination of livestock grazing from:

- + Proposed Wild and Scenic River corridors and their tributaries
- + Riparian fish and wildlife habitat

There are 15 State of Oregon water quality IMPAIRED STREAM REACHES on LRA-administered lands. According information on the EPA website at:

http://oaspub.epa.gov/waters/state_repl_control?p_state=OR

There are 44 Clean Water Act Section 303(d) IMPAIRED WATERS, none of which have been selected for Total Maximum Daily Load (TMDL) development. We recommend that TMDL plans be developed and implemented for each of these streams, with priority given to those under Wild & Scenic River consideration and subsequently to those streams flowing across allotments rated as "I" category status. We also recommend that Allotment Management Plans recognize instances where a listed waterbody is impacted by the management decisions and eliminate or reduce AUM levels to the point where compliance with applicable water standards is achieved. Given the low priority that the State of Oregon Department of Environmental quality places on monitoring and developing impaired waterbodies on the LRA, the Juniper Group Sierra Club is investigating implementation of a volunteer stream monitoring program. We hope to work closely with the BLM and State of Oregon to see that real improvement of water quality limited streams occurs on the LRA.

Issue 4. *How should recreation be managed to meet public demand while protecting natural values and health and safety of the public?* It is our view that most recreational activities can be accommodated while protecting natural values. However, BLM has a responsibility to protect natural values from activities that will cause harm. If recreational activities threaten natural values or the health and safety of the public, they should not be allowed regardless of "demand." Most recreational activities have little impact on natural values. The one glaring exception is motorized off-road vehicle use. This single activity has caused more damage by fewer individuals

ultimate goal is not simply compliance with state standards. The water quality restoration plan would outline a strategy, including a timeline and funding sources, for restoring conditions to ecological site potential. Whether the system can be restored to the upper limit of site potential condition and to greater than "low" ecological integrity warrants further assessment. The BLM is using the riparian score card method to complete this assessment. The use of riparian scorecards will enable the BLM to better define, implement, and monitor BMP's and appropriate protective, restorative, and/or mitigative actions. This approach is consistent with the State of Oregon's antidegradation policy that is intended to protect water from unnecessary degradation from point and nonpoint sources of pollution, as well as to protect, maintain, or enhance water quality in order to protect all existing beneficial uses. Policy implementation relies on an assessment of site-specific condition and understanding of local conditions to develop the best treatment technologies and management practices. The total maximum daily load and water quality restoration plans development process, as well as the riparian score card assessment, should yield the information necessary to pursue the goals of ensuring long-term sustainability of a healthy, productive landscape.

243-10: The LRA would manage for healthy watersheds, directing management toward defining and achieving healthy watersheds in a variety of ways. The BLM would define desired ranges of conditions for riparian areas and inventory riparian ecological types, comparing them to potential natural vegetation, geomorphic stream structure, and soil conditions. The text was changed to clarify this point.

243-11: ODEQ is responsible for scheduling the development of total daily maximum loads and the BLM would work with them. The effects of an allotment management plan on water quality are determined in an assessment of standards for rangeland health. If it is determined that livestock are contributing to the non-attainment of the water quality standard, as soon as is practical but no later than the start of the next grazing season, management would be implemented to ensure progress is being made toward attainment of the standard. The BLM looks forward to working with a volunteer stream monitoring program, especially on the quality assurance aspect.

5/8

than all other recreational activities combined! If not controlled, motorized off-road vehicle use will supplant livestock grazing as the most ecologically destructive activity on public lands. Motorized off-road vehicle use introduces noxious weeds, disrupts wildlife, damages rangeland and riparian habitat, destroys biotic crusts, and endangers the public. In addition, many recreational off-road vehicle users are reckless, irresponsible, and do not even abide by the existing lax regulations, further endangering natural values and public safety. Our organization has documented innumerable instances of such illegal behavior.

Sierra Club Conservation Policy on Off Highway Vehicles includes the following:

"Use of vehicles on public lands other than wilderness:

- 1. Trails and areas on public lands should be closed to all vehicles unless it is determined to be appropriate for their use through completion of an analysis, review, and implementation process, and officially posted with signs as being open.*
- 2. The process must include application of objective criteria to assess whether or not environmental quality can be effectively maintained, and whether the safety and enjoyment of all users can be protected; a public review and comment procedure involving all interested parties; and promulgation of effective implementing regulations where impacts are sufficiently low that vehicle use is appropriate.*
- 3. Trails and areas designated for vehicular use must be monitored periodically to detect environmental damage or user interference inconsistent with the above criteria. Where this occurs, the trail or area must be closed to vehicles unless effective corrective regulations are enforced.*

Adopted by the Board of Directors, May 7, 1988 [replaced policy adopted in February 1972, as modified in May 1985 and March 1986]"

Neither alternative C nor D will do enough to attain the RMP goal of ensuring long-term sustainability of a healthy and productive landscape. We recommend that all recreational motorized vehicle use be limited to designated ways and trails throughout the planning area except for Wilderness Study Areas, which should be closed. Ways and trails should be closed to all motorized vehicle use during appropriate seasons in sensitive wildlife areas, such as deer and elk winter range and Sage Grouse breeding and nesting areas. OHV use should be excluded from riparian and aquatic areas.

Other Issues not addressed:

Predator control: Although not addressed in the RMP/EIS, "predator control" practices have a significant impact on the long-term sustainability of a healthy and productive landscape. The ecosystem has evolved over the past several million years to accommodate predators. Predators are vital to keeping the ecosystem healthy and balanced. Killing predators such as coyote and cougar in the planning area has been detrimental to the native wildlife. Ecosystem integrity has suffered as a result. It is our recommendation that predator control measures be eliminated entirely except in the case where there is a credible threat to public safety.

Conclusion: The Draft Lakeview Resource Management Plan / Environmental Impact Statement has a laudable goal. Alternative C comes the closest to meeting the stated goal, and we recommend that it be the preferred alternative. Alternative D will not ensure long-term sustainability of a healthy and productive landscape, and should be dropped as the preferred alternative. Please review the following excerpt from Sierra Club's National Conservation Policy on Public Lands Grazing:

"Local Sierra Club entities are urged to advocate whatever incremental improvements seem most appropriate for specific sites within their jurisdiction up to and including an end to commercial grazing."

6/8

243-12

243-12: Refer to comment response 219-3.

243-13

243-13: As stated in Appendix B and Chapter 2, the BLM is responsible for managing wildlife habitats. The Animal and Plant Health Inspection Service, as well as ODFW and the USFWS, are responsible for managing wildlife populations. Concentrated control efforts on public lands by Animal and Plant Health Inspection Service ceased in 2001 and are not likely to occur in Lake County in the near future, due to changes in local matching funding. The impacts of the former wildlife damage management program have already been addressed. It is unclear what effect cessation of this program would have on future predator populations in Lake County.

In addition to local site-specific efforts, the Club may seek federal legislation and regulations to curtail grazing and accomplish the other goals of this policy.

Recognizing that changes to grazing policy will likely take a number of years to accomplish and that some areas of the public lands are more imminently threatened by destructive grazing practices than others, the Sierra Club has prioritized our efforts. As a first priority, the Sierra Club will work toward ending commercial grazing on federal public lands where one or more of the following circumstance exists:

- + Lands that receive an average annual precipitation of 12 inches or less or areas with cryic soils.
- + Associated activities (e.g., water developments, predator control, vegetation manipulation) are occurring in such a manner that native plant and animal species are significantly impacted.
- + Grazing is causing degradation of habitat necessary for threatened, endangered or sensitive native plant and animal species.
- + Grazing is causing significant degradation of water quality.
- + The public land management agencies have insufficient funding, staff, and determination to create and administer monitoring systems that will provide reasonable assurance that adverse impacts will be minimized and opportunities for restoration taken advantage of.

Adopted by the Sierra Club Board of Directors, September 24, 2000 "

Please note how many of the conditions listed for priority work on behalf of the Sierra Club toward ending commercial grazing occur on the LRA.

To reiterate the Juniper Group Sierra Club's recommendations specific to the Draft RMP/EIS:

- + Alternative C (with appropriate changes as noted) should be adopted as the Approved RMP over the alternative identified by the BLM as the Preferred Alternative.
- + We recommend that a complete record of allotment evaluations be established and scheduled on a realistic timeframe that would allow for adaptive management of site-specific conditions to be meaningful and appropriate to initiate recovery of native ecosystems and sensitive or T&E species.
- + BLM should be prepared to accommodate for additional WSA designation and management within the next 5 years, and should address this in the RMP.
- + All 17 miles of Honey Creek, and 6 miles of Twelvemile Creek should be recommended as suitable for inclusion in the national wild and scenic river system
- + Exclude off-road vehicle use in WSA's, ACEC's and known occupied Sage-Grouse habitat.
- + We suggest consideration of permanent removal of livestock from areas now in unsatisfactory condition. We also suggest that BLM remove livestock from all of the following areas: Sage-Grouse leks and important Sage-Grouse habitat (i.e., mating, brood-rearing areas), Areas of Critical Environmental Concern (ACECs), Wilderness Study Areas (WSAs) and Grazing Allotments that can be shown that they are not meeting Standard 5 for T & E species.
- + We recommend that all future assessments of grazing allotments include an ecologist and be open to public participation and review.
- + We request documentation be provided to the Juiper Group Sierra Club on which allotments were selected for assessment, the procedures and protocols used to assess each allotment and the results of each assessment.
- + We recommend that livestock grazing be excluded from and OHVs be managed so that they do not interfere with riparian habitats. Objectives and goals for riparian and stream condition, as well as for all special status plant and animal species need to be established and documented for each allotment. We also recommend elimination of livestock grazing from: Proposed Wild and Scenic River corridors and their tributaries and riparian fish and wildlife habitat.
- + We recommend that TMDL plans be developed and implemented for each State DEQ and Federal EPA impaired waterbody or stream, with priority given to those under Wild & Scenic

River consideration and subsequently to those streams flowing across allotments rated as (I) category status. We also recommend that Allotment Management Plans recognize instances where a listed waterbody is impacted by the management decisions and eliminate or reduce AUM levels to the point where compliance with applicable water standards is achieved.

- + We recommend that the conservation goals outlined as part of the Greater Sage-Grouse and Sagebrush-Steppe Ecosystems Management Guidelines be implemented and rigorously followed, including implementation monitoring for all known occupied Sage-Grouse habitat.
- + All energy and mining development (leasable, salable and locatable) where a plan of operations is required, should be prohibited within a minimum of 1km radius from known/occupied Sage-Grouse habitat, including Leaks, Nesting/Early brood rearing/Late brood rearing and Wintering habitats.

- + We request that further reductions in allocated AUM's beyond the 20% reduction outlined under Alternative C be considered and offered to the public for review and selection.

In conclusion, we are unable to support the proposed Preferred Alternative D. We hope the Lakeview Draft team recognized the need to implement Alternative C. This should serve as a baseline with the modifications listed above offered as part of an improved alternative C. This in turn should be offered to the public for comment in a Proposed RMP/Final EIS.

Yours truly, *Sandy H. Lonsdale, Chair*

Juniper Group Sierra Club
16 N.W. Kansas
Bend, OR 97701-3302

Sandy Lonsdale: Chairman Juniper Group Sierra Club, Oregon Chapter Sierra Club Grazing Issue Coordinator

John Anderson: Juniper Group Sierra Club Executive Committee

Phil Blatt: Juniper Group Sierra Club Executive Committee

Shinann Earnshaw: Juniper Group Sierra Club Executive Committee

Kent Gill: Juniper Group Sierra Club Executive Committee

Mark Hanschka: Juniper Group Sierra Club Executive Committee

Craig Miller: Juniper Group Sierra Club Grazing Committee, Lake County Landowner

Marilyn Miller: Conservation Chair, Juniper Group Sierra Club, Executive Committee

David Tracy: Chair, Juniper Group Sierra Club Grazing Committee, Executive Committee

George Wilson: Juniper Group Sierra Club Executive Committee

8/8

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Via Fax: 541 947 6399

Re: Lakeview Resource Management Plan

Dear Mr. Sykes:

I am writing to encourage adoption of alternative D. I do not believe that an approach as radical as Alternative C is needed. I do not believe that banning ORVs serves the best interests of the public that uses the area. I do not agree with those who assert ORVs are damaging the lost forest and dunes areas. I would agree that ORVs should be limited to "two track" and limited from some of the dunes.

I do agree that wild and scenic designation should be given to 22.8 miles of the Honey, Twelvemile and Guano Creeks. I also feel mineral extraction and energy uses should be banned in most of the area.

I feel that ORV use is being unfairly targeted by certain groups and that a sad side-effect of this is a preservation of certain areas for the use of a group that is typically professional/upper class. Anyone can tell you that ORV users are (generally) more working class, ordinary type people, and furthermore, that most of us are concerned with the environment and a bad image put across by a few irresponsible people.

I urge you to adopt Alternative D, with some alteration, as outlined above. I think it is the best balanced approach for now.

Thank you.

Simon Harding

1927 SE Elliott Avenue, Portland Oregon 97214

THU 31 JAN 02

MR. SYKES -

I'M WRITING TO COMMENT ON THE LAKEVIEW RESOURCE
MANAGEMENT PLAN.

HONESTLY, I CANNOT UNDERSTAND HOW ANYONE WHO CARES
ABOUT THE OREGON DESERT OR HAS SEEN WHAT HAS HAPPENED
TO SO MUCH OF IT COULD, IN GOOD CONSCIENCE, ENDORSE
ALTERNATIVE D. PEOPLE, ESPECIALLY LAND MANAGERS, NEED
TO RECOGNIZE THAT THIS AREA IS LARGE, BUT FINITE, AND
FINITE THINGS RUN OUT.

I HAVE SPENT MUCH TIME IN THE LAKEVIEW R.A.
AND HAVE BEEN ABLE TO SEE QUITE A BIT OF IT.
ALTERNATIVE D WOULD, IN MY OPINION, WOULD BE A DEATH
SENTENCE FOR WHAT MAKES THIS SUCH A WONDERFUL
AREA. CURRENT LEVELS OF LIVESTOCK GRAZING AND
VIRTUALLY UNRESTRICTED ORV USE CAN DO NOTHING BUT
FURTHER, AND GREATLY, DEGRADE THE LAKEVIEW R.A.

I STRONGLY URGE THE BLM TO NOT IMPLEMENT
ALTERNATIVE D. ALTERNATIVE C IS A MUCH BETTER
MANAGEMENT PLAN FOR THE AREA, ALTHOUGH IT HAS
WEAKNESSES. REASONABLE CAPS ON LIVESTOCK GRAZING
NEED TO BE PUT IN PLACE. I FIRMLY BELIEVE THAT
THERE NEEDS TO BE ORV RESTRICTIONS OVER FAR LARGER
AREAS THAN ALT. C PROPOSES.

THE BLM IS ENTRUSTED BY THE AMERICAN PUBLIC TO
PROTECT AND INTELLIGENTLY MANAGE THE LAND UNDER ITS
JURISDICTION. I HOPE ALT. C (WITH STRENGTHENED
PROTECTIONS) IS CHOSEN AND IMPLEMENTED TO FOLLOW UP
ON THAT TRUST.

THANK YOU. JON CAIN
BEND, OREGON

Letter 246 was a duplicate and removed.

L-246

LAKEVIEW
FEB - 1 2002
LAKEVIEW, B.L.M.

January 30, 2002
1440 N. E. Tenth Street
Grants Pass, OR 97526

Lakeview District office
Bureau of Land Management
Attn: Dwayne Sykes
HC 10 Box 337
Lakeview, OR 97630

RE: Lakeview RMP

Gentlemen,

I have reviewed the proposed Lakeview Resource Management Plan and wish to offer the following comments:

The preferred alternative "D" does not adequately protect the resource, particularly in the area of livestock grazing management. Even the most casual observer can see that the range is in poor condition, yet this alternative does nothing to reduce grazing.

Almost the entire planning area is left "open" to off-road vehicle use. The damage being caused by the irresponsible use of these machines must be controlled if soils are to be preserved. BLM must reverse it's policy by posting "open" areas where harm to the environment can be minimized and prohibiting ORV use in all other areas.

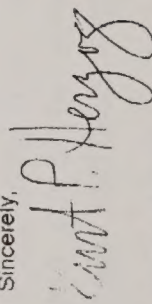
The reliance on "adaptive management" is no substitute for adherence to stated goals, standards and guidelines. The public has a right to expect their lands to be managed to strict standards that will protect the resource in all cases.

Alternative "C" is a much better approach and should be used as the basis of a new "preferred" alternative. It should be further strengthened by setting reasonable limits on livestock grazing and limiting ORV use to "open" areas only.

Finally, a personal note: I have traveled to the Lost Forest area several times over the past ten years or more. The damage being done to this area by off-road vehicle use is unacceptable. The entire forest is criss-crossed by meaningless roads and tracks, and strewn with trash. In any alternative this unique area should be closed to ORV use and rehabilitated.

Thank you for the opportunity to participate in the management of the public's lands.

Sincerely,



Kurt P. Herzog

January 30, 2002

Dwayne Sykes
BLM-Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

FEB - 1 2002
LAKEVIEW, B.L.M.

Dear Mr Sykes,

My wife and I are writing to you in regards to the Lakeview Resource Management Plan. This plan maps out management strategies for some of Oregon's most beautiful high desert places in the south central part of the state.

We are concerned that the BLM's preferred alternative does not do enough to protect these places from ecological damage. I have personally hiked through a variety of areas in Oregon's High Desert areas and have seen the negative effects of ORV use and cattle grazing. Both of these have led to the spread of noxious weeds, ~~the~~ degradation of native plants from being run-over or grazed too often. Such destruction leads to loss of habitat for animals such as the Sage Grouse. Government biologists have clearly monitored the slow but certain decline of this bird and all agree that native plant & habitat destruction is the number one cause. If this doesn't change the Sage Grouse will (without doubt) end-up on the endangered species list.

We urge you to choose the Alternative C management plan. This plan clearly strengthens habitat protection by excluding livestock and ORV use from sensitive ecological areas such as Sage Grouse leks, proposed wild and scenic rivers, WSAs etc.

Sincerely, Greg & Catherine Becker
1449 New Lexington
Bend OR. 97701

Dwayne Sykes
Bureau of Land Management,
Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Janet Carter
Blue Mountains Biodiversity Project
League of Wilderness Defenders
29803 Williams Lane
Fossil, OR 97830

January 29th, 2002
FEB 1 2002
LAKEVIEW, B.L.M.

Comments Re: the Lakeview Resource Management Plan

Dear Mr. Sykes,

I spend alot of time out enjoying Oregon's high desert and our organization, the Blue Mountains Biodiversity Project, is dedicated to protecting biological diversity and ecological integrity in wild public lands of Eastern Oregon. I write on behalf of both myself and the Blue Mountains Biodiversity Project. In our explorations of Oregon's high desert country, we've noticed severe degradation by livestock grazing and scars of excessive ORV use in areas with fragile soils and vegetation on BLM lands. We would like the BLM to ensure protection of special and sensitive wild places from grazing, ORV, mining, roading, Animal Damage Control species eradication efforts and other human impacts and allow for potential wilderness designation of appropriate places like Warner Wetlands, Lost Forest, Abert Lake and Guano Creek. In the long run, full protection of such unique and vulnerable places will best ensure that ecological integrity is protected, depleted water tables are restored, wildlife is diverse and abundant, soils are stabilized and productive, and in general, that Eastern Oregon is able to sustain natural ecosystems and healthy human communities and will be a place of which residents can be proud. Specifically, we ask that you adopt Alternative C with the following stronger protections: please exclude livestock grazing and off road vehicle from: - Sage grouse leks, -

- proposed Wild and Scenic Rivers - critical fish and wildlife habitat - grazing allotments in "fair" or "poor" condition, - Wilderness Study Areas, - areas where rare or listed plants are known to occur, - areas with known or suspected native cultural artifacts and - areas of Critical Environmental Concern.

We don't trust "adaptive management" to fully protect natural values or biodiversity. Objective standards and guidelines need to be established and enforced. So far, more flexible management practices have only led to continued, cumulative degradation of the ecosystem and values (such as water availability and soil productivity) in which human communities depend.

Please take this opportunity with the Lakeview Resource Management planning process to reassess your wilderness recommendations for the Lakeview Resource Area. The five Wilderness Study Areas found unsuitable for wilderness in 1989 may now be viewed differently in the light of increased public demand for wilderness protection and failure of some expected development projects (geothermal, mineral, etc.) to take place there. We support the ^{full} preservation of natural values in all suitable Wilderness Areas (Wilderness Study Areas) as well as increased protection of ecological integrity and biodiversity in all other areas under BLM management.

Thank you for your consideration
of our comments.

This letter was a duplicate and removed.

To Dwayne Skyes
BLM - Lakeview District Office
HC 10 box 337
Lakeview, OR 97630

Jan 23, 2002

I am writing with comments regarding the the proposed Lakeview RMP. I am a lifelong resident of Oregon and have been visiting Lake County since I was a young boy to explore Warner Valley, the Warner Mts and Abert Rim, Hart Mt, and the area around the Christmas Lake Valley. Many of my fondest memories are of these places.

I would like to urge you to adopt a stronger level of ecological protection for the landscape you are charged with. I believe that your preferred alternative D will not provide the protection and opportunity for rehabilitation that the land deserves, so I urge you to choose alternative C instead and even to consider enhancing that alternative.

I have hiked and fished along portions of Honey Creek, Twelvemile Creek, and Guano Creek and think all three are outstanding streams blessed with remote beauty. Although they are small streams, that is the nature of water in the desert and these three are important drainages which deserve recognition and protection for both their scenic and ecological values. I realize they must be legislatively designated, but until that time, I would hope you support the idea by managing them as if they were Wild and Scenic, for they are at heart.

As I have grown older, I have increasingly become sensitized to the detrimental effects of unmonitored overgrazing of the land, especially in riparian areas. While I struggle with the notion of excluding cattle from public land, I think something needs to be done to let the landscape begin to recover and I wholeheartedly supported the idea of excluding cows from the stream side riparian areas. While this may seem a monumental task, the ecological benefit is worth the effort and cost and I urge you to adopt this standard. I am tired of seeing cow shit in the creeks and stubble for stream side vegetation. I also support the idea of reducing the overall load of grazing on the landscape as a whole; 20% seems like a reasonable amount. Though this will be an imposition on public lands grazers, I think it is high time that their nearly free ride is tempered by wise management of the land. If the BLM is ever going to demonstrate that managed grazing is in fact compatible with a healthy ecosystem and sustainability, they you will have to start not only reducing the numbers of cows on the landscape, but also redirect where and how that grazing occurs. If ranchers are unwilling to embrace such changes, then the only alternative I see is to eliminate grazing altogether, after all, the land is public land not the private property of a leasee.

As far as ORV's go, I have sadly witnessed the near destruction of the beauty contained in the Lost Forest and adjacent Sand Dunes area due to rampant uncontrolled abuse by ORV users. My childhood vision of the area may never recover in my lifetime, but it is time to at least start the rehabilitation. It is a shame that these unique areas have not been effectively protected. I urge you to exclude such use from the ACEC and WSA. In that same vein, I think that you should simply ban or limit ORV's from cross country travel throughout the district. There is no need to have the whole landscape open to this type of destructive "recreation". There are plenty of ways and dirt roads to travel as it is. I highly approve of closing such roads in sensitive riparian areas as well. Lets keep both the cows and the cars out.

There are many other positive aspects of alternative C as well; increased ACECs, WSA additions, etc. In summary, please reject alternative D and adopt Alternative C as the most reasonable and wise plan for managing the land for the greater good of the public. This is an opportunity for the BLM to step up to the plate and manage for the 21st century.

Thank You

Borden Beck
1812 SE 33rd

Portland OR 97214

Borden B. Beck



U.S. Department of the Interior
Bureau of Land Management
Lakeview Resource Area
Lakeview, Oregon



Public Meeting for Lakeview Draft RMP/EIS

LEAVE COMMENTS AT REGISTRATION TABLE OR FOLD, STAPLE, AND MAIL.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Lakeview BLM Office, 1300 South G Street, Lakeview, Oregon during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization:	RON GRACE (Land owner)		
Address:	2377 NW 105TH CT	Redmond, OR	Zip Code: 97756
Comments:	I HAVE READ THE PROPOSED ALTERNATIVE AND TAKE EXCEPTION TO THE NEED TO CLOSE THE NORTHERN AND WESTERN BOUNDARIES OF THE DISTRICT TO OHV'S - THE PRINEVILLE DISTRICT AND THE BEND/FORT ROCK DISTRICT DO NOT HAVE SUCH CLOSURES AND THIS SEEMS ADD TO ME. IN THE DOCUMENT YOU ADMIT THAT IT IS NO ~~SUBSTANTIAL~~ SOUND SCIENTIFIC DATA TO POINT TO ADJUST AS THE BASIS FOR THIS CLOSURE. AS SUCH IT SHOULD NOT BE ALLOWED. IT SEEMS THIS IS ANOTHER CASE OF MANAGEMENT BY FEELING OR PERCEPTION! THIS IS NOT SOUND MANAGEMENT! FREQUENCY OF USE SHOULD BE STUDIED IN THIS AREA. OK ARE YOU ALLOWING (AS OTHER PLACES HAVE) THE ODFW TO MANAGE YOUR LAND FOR YOU WITHOUT ANY SCIENTIFIC (SOUND) DATA TO BACKIT UP? THE SAME GOES FOR THE EXPANSION OF THE FOSIL LAKE CLOSURE WHICH WILL CUT OFF OUR ACCESS FROM OWNED LAND TO THE SAND DUNES. THIS CONSTITUTES A TAKING OF OUR ACCESS! THE EXCUSE USED WAS "POSSIBLE DESTRUCTION OF FOSSILS" CONT'D p.2		

Signature: Ron Grace Date: 1-25-02

252-1

252-1: The proposed OHV designations on the western and northern boundaries of the resource area limit OHV uses. The mule deer winter range area would be limited to designated roads and trails from December 1 through March 31, and during the remainder of the year limited to existing roads and trails. In the draft plan, we proposed to limit OHV uses to existing roads and trails in an area we referred to as the "northern wildlife area." Under the final plan, the proposed OHV designation for the entire North Lake Special Recreation Management Area would be limited to existing roads (and ways) and trails (except where identified as more or less restrictive in certain areas) (see Maps R-7 and SMA-24). The "northern wildlife area" is located entirely within the North Lake Special Recreation Management Area, so future reference will be made to the North Lake Special Recreation Management Area when discussing OHV designations.

252-2

The areas in question would only be closed to crosscountry OHV use (off of existing roads and trails). OHV use would still be allowed on existing roads and trails (see Map R-7). In addition, under the preferred Alternative D, crosscountry use would be allowed in most parts of the Sand Dunes WSA (see Map SMA-9a). Some roads within mule deer winter range would be seasonally closed from December 1 to March 31 to limit disturbance to wintering mule deer populations (see Map SMA-24). It is true that neighboring portions of both USFS and Prineville District BLM lands currently do not have these restrictions. However, when the Prineville District was contacted in the early planning stages of preparing this document, they indicated that they would be considering such restrictions during the next update of their RMP. The increase in OHV use in the planning area and other public lands in the West is well documented.

Row Gino Response to Draft Imp/Es p. 2

1. High Flooding times will not destroy whatever may be on the sandy areas that link our private land with the Dunes

2. Do you intend to keep out Elk, Deer, Antelope that use this area regularly? They have a potential to destroy things on the ground also with the small area of their hooves and thus the higher ponds per sq in of pressure ON the ground. If not you are accepting this process and destroying another use (Cott's) as Habitat and ~~the~~ ^{their} Exclusionary.

252-2: Under the preferred Alternative D, access to the dunes from private land has not been denied and is available either by existing roads or directly overland. The northeast boundary of the proposed expansion of the Fossil Lake Vehicle Closure Area has been redrawn to facilitate access to the large, continuous dunes in the area (see Map SMA-9a). OHV impacts on exposed fossils is well-documented in this general area.

RECEIVED
FFR - 1 2002
LAKEVIEW, B.L.M.

Dwayne Sykes
BLM, Lakeview District Office
H C 10 Box 337
Lakeview, Oregon 97630

Dear Mr. Sykes,

I am writing to urge you to please take this "once in twenty years" opportunity to update your wilderness recommendations concerning the Lakeview Resource Area, by choosing Alternative C - NOT alternative D. Please ban livestock grazing and off-road vehicles from proposed wild and scenic rivers, critical fish and wildlife habitat, sage grouse mating habitat, areas of critical environmental concern, wilderness study areas, and grazing allotments in "fair" to "poor" condition.

"Adaptive" Management" is NOT a substitute for objective, well thought out guidelines. Adaptive management without constant on-site monitoring can only lead to further degradation of the environment.

Thank you very much for your attention to this matter.

Please let me know what you decide - and why.

Thanks again,

Kate Scott

Kate Scott
1470 Channel Road
Lopez Island, Wa. 98261

Box 85425
Seattle, WA 98145
January 29, 2002

FFR -- 1 2002

LAKEVIEW, B.L.M.

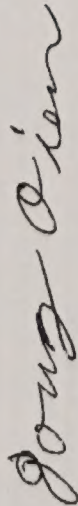
Mr. Scott Florence, Area Manager
Bureau of Land Management
Lakeview Resource Area
P. O. Box 151
Lakeview, Oregon 97630

I support a plan generally between alternatives C and D. While alternative D would probably be sufficient to prevent a decline in conditions and avoid future restoration costs on most of the 3.2 million acres of public land in the Lakeview Resource Area, the primarily natural areas should be allowed to improve in condition to the greatest extent possible. I have done a fair amount of hiking in the LRA and most of the "natural" areas I have visited have been noticeably impacted by grazing and/or vehicle use. I was very disappointed by the severity of the impact on vegetation by grazing in the Hawksie-Walksie and commented previously on the impact of grazing on cultural resources on Abert Rim.

I believe the current and proposed ACECs, along with the WSAs recommended for Wilderness designation, include the best and potentially best natural areas of the LRA. It is these ACECs and WSAs that I believe deserve to be afforded the protections of alternative C or better. Where practical, developments outside of these areas should be used to mitigate a decrease in grazing, vehicle use, and other impacts within these areas. In particular within these areas, Water Resources / Watershed Health goal 1, action 3 (pg. 3-17) should be alternative C rather than the minimum conditions of alternative D. Vehicle use should be limited or closed. Lands and Realty goal 2, action 2 (pg. 3-36) and the goal 4 action should be alternative C. The Livestock Grazing Management Direction of alternative C on pg. 3-70 should apply. The Energy and Mineral Resources Management Direction should be alternative C. The management direction for wild horses should emphasize protection of native flora and fauna over wild horses. Alternative D should generally apply outside of these ACECs, proposed ACECs, and recommended WSAs. This would amount to only about 10% of the LRA being subjected to the more rigorous standards of alternative C with some of the management actions of alternative B being applied to appropriate areas outside of these special areas to offset the effects of alternative C within them.

I believe that applying different management directions to different classifications of areas, like the management emphasis clusters and the subbasin restoration priorities of the ICBEMP, prevents the mediocrity of a "one size fits all" approach and provides the best outcome for a variety of users. Thank you for this opportunity to comment.

Sincerely yours,



Doug Oien



U.S. Department of the Interior
Bureau of Land Management
Lakeview Resource Area
Lakeview, Oregon



Public Meeting for Lakeview Draft RMP/EIS

LEAVE COMMENTS AT REGISTRATION TABLE OR FOLD, STAPLE, AND MAIL.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Lakeview BLM Office, 1300 South G Street, Lakeview, Oregon during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. *If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments.* Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: Taylor Ranch Inc.
Address: PO Box 51, Plush OR 97637

Comments: Re: Lakeview Draft Resource Management Plan

Our main concern with the RMP is in regard to the parcels of BLM land listed for disposal (Zone 3). The parcel indicated below * is listed as a Zone 2 (retention/acquisition). We would like to request that it be put into a Zone 3 (for disposal). The parcel is completely surrounded by one landowner, that landowner being: Taylor Ranch, Inc. Several parcels in the immediate area have been listed as Zone 3, we feel the reason this parcel was excluded from Zone 3 listing is because it falls in a Major Utility Corridor. On our private land we also have given right of ways to the Bonneville Power Administration (BPA) and feel that we could do so as well on this parcel should it be listed for disposal.

John & Theresa Taylor
Taylor Ranch, Inc.

* T.36S., R.22E., W.M., Oregon
Section:
23: N1/2 SE1/4, SW1/4 SE1/4, SE1/4 SW1/4
26: NE1/4 NW1/4, S1/2 NW1/4

255-1

255-1: The LRA staff has reviewed and acknowledged your request for the inclusion of the specified public land in Land Tenure Zone 3 (see Table O2-1 in Appendix O2).

Jan 30 - 2002
La Boreas Dragon

Subject,
Draft La Boreas,
Resource Management Plan,
Environmental Impact Statement

Mr Scott R. Florence,

With pen in hand I will
attempt a comment on this study of
our desert,

I have not had time to go
thru the material twice as I had
planned, also I have a very busy
work schedule and bad weather
has kept me away from public
meetings

This study is very thorough I
find, and I think it will suffice
for some years to come. I have
had very little contact with anyone
else concerned with this study,
because to do so would no doubt
pollute my thinking, or lead
in another direction, as you can
tell I'm not used to these missives,
so bear with me, because being

a grand parent I'm used to
grouching a little.

Recreation will always be hunting,
fishing, bird watching ect. and I
think our desert outback furnishes
a place for this.

This poses questions and concerns
for ranchers such as myself. Will
my rights be respected also? I
have been given the distinct feeling,
that the opinion is, that there
should be a distinct curtailment of
grazing on public lands.

Correct me if I'm wrong, but
I understand that this bureau was
established for the very purpose
of grazing livestock, put together by
ranchers and participating members
of the livestock community and
arbitrary body regulatory commission
to help in the business of livestock
production.

In order to address concerns of
the environmental community, I
would say that in every facet of
this study, it comes back to
flora and fauna which in turn
translates to feed or sanctuary for

the same, whether it be live-stock, wild horses, birds, rodents, etc.

This desert outback as some are wont to call it is not your back yard garden. Anyone that proposes the shifting or cultivation of these premises by individuals should take a long look at their own back yard, for as much as we can do for this piece of earth that we share, the elements of nature will dictate the outcome.

This piece of earth was given to us by an entity of which we have damned little comprehension, and on that premise I think we must base any assumption, or projected outcome of any specific action, recreation, live stock products, etc.

In order not to bore you I will digress to history to explain some of my feelings for this.

In the 1800's Peter Sheen Ogden and John C. Temont and party set out from Fort Bidwell and before they got ~~to~~ ^{BUY'S} they were butchering their mounts and pack-horses. Why? Because there was

(14) no game, no deer, elk, wild horses, buffalo, nothing. Any thing ^{here} was brought by settlers and today's effort of the B. J. M.

Water holes, drift fences, repairs where possible have been done by me. I am 67 years old and I've been involved in these efforts to ensure that life on these pieces of land get water and food.

If I am to give the summation of this properly, let any one not involved in any particular area of this activity bring something from his or her area to show how they are taking care of their part of the environment, or let folks alone where they are, because we always have and we always will care for our piece of earth.

As ever
your
Seward
John Stone



Lake District Office

January 31, 2002

Bureau of Land Management
Dwayne Sykes
HC 10 Box 337
Lakeview, OR 97630

RE: Draft Lakeview Resource Management Plan/Environment Impact Statement

We would first like to thank you for the opportunity to participate in the Lakeview Resource Management Plan (LRMP) planning process and for this opportunity to comment on the draft LRMP.

We believe a modified alternative D will help achieve the LRMP's purpose and need of ensuring long-term sustainability of a healthy and productive landscape, beginning the restoration to healthy and sustainability watershed conditions, lowering the risk of catastrophic fire, and continuing to maintain or improve aquatic and terrestrial habitat.

ODFW supports the management direction BLM is moving towards with the following general comments:

We have concerns regarding the ACEC designations. Some of the road closures within the new ACEC/RNA's restrict access to guzzlers, greater sage grouse leks and wildlife inventory areas such as upland bird and greater sage grouse brood routes, winter bald eagle survey and mule deer herd composition count. As designated the ACECs may impact our ability to manage wildlife populations and BLM's and ODFW's cooperative ability to manage wildlife habitats. We would like to meet with you to discuss these concerns prior to the adoption of the final LRMP.

All resource or resource programs need to make sure their recommendations are not in conflict with the interim greater sage grouse and sagebrush-steppe ecosystems management guidelines or with other resource or resource program recommendations.

Throughout the LRMP-EIS the term crucial winter range is used. We have concerns regarding the use of this term. We identified winter range habitats for mule deer and pronghorn year round habitat (See Map W-2). All of these winter habitats are essential to wildlife. Therefore, we recommend the word crucial be

257-1

257-2

257-1: The BLM recognizes that the preferred Alternative D is not completely in compliance with the greater sage-grouse management guidelines for minerals and rights-of-way. These were developed as guidelines rather than formal prescriptions, and do allow field managers to use their best professional judgment, along with Federal laws and regulations, to guide future management. The long-range conservation plan, in progress at this time, should address these concerns and would amend, if necessary, any management deficiencies relating to greater sage-grouse.



P. O. Box 69
Summer Lake, OR 97640
(541) 943-3324

removed throughout the document, and change pronghorn crucial winter range to pronghorn habitat.

For reseeding projects native perennial and annual seed mixes should be used whenever possible.

Vegetation management direction of the LRMP appears to be toward big sagebrush types while other communities such as low, silver and black sage are not adequately addressed. We would like you to identify what management options would be considered for other habitat types.

Riparian conservation areas are portions of watersheds where aquatic and riparian-dependent resources receive primary emphasis and where management activities are subject to specific standards and guidelines. In riparian conservation areas, the maintenance, protection, and restoration of aquatic processes and functions are emphasized to meet the goals and objectives for aquatic and riparian habitats. We support the move toward the use of riparian conservation areas as defined above, however, we recommend that Potential Natural Community (PNC) is added as a component for the management of the riparian conservation areas. It is very important that these areas be identified and delineated prior to management activities. And that all management activities are evaluated for impacts to riparian conservation areas.

Attaining proper functioning condition (PFC) is extremely important, and is a very important first step towards improving riparian function and watershed restoration. However, it must be noted that a riparian area can be in PFC, but still not provide adequate fish and wildlife habitat. We have observed this on numerous streams and site tours. PFC can promote minimum and or detrimental habitat conditions for fish and wildlife.

BLM has successfully taken the first step towards achieving their PFC goal. However, we encourage you to expand upon this and pursue riparian management under a PNC strategy. PNC would improve salmonid populations and habitat and water quality parameters. BLM needs to incorporate PNC into the management of its riparian areas. We would be willing to assist in developing and reviewing a PNC protocol.

The following quotes from the LRMP support this recommendation. Pg 4-37 "PFC is the first step towards achieving the desired range of conditions. It would not achieve the PNC or desired condition." Pg. 4-47 "Riparian objectives are determined based on PFC levels, so consideration of potential is lacking and could result in poorer condition." Pg. 4-47 "PFC is only the beginning point, with desired range of condition usually being a much more improved state, so by setting objectives based on PFC only, development to full potential of the habitat could be precluded or not described adequately."

OHV activities and management efforts to control them have become a huge issue for public land managers throughout the west. Given the emphasis of BLM's Environmental Impact Statement -- of managing for activities compatible with the ecosystem -- the high number of open acres to OHV use seems to be in conflict with the rest of the plan. Considering the sensitive nature of the rangelands, invasive and noxious weed concerns, along with wildlife issues, the alternatives that propose leaving 2 million plus acres open to OHV use seems to be in direct conflict with planning efforts to restore, rehabilitate, protect, and/or enhance resource values

257-2: We removed all references to *crucial* deer and pronghorn habitat in the document, recognizing that all winter habitat is crucial depending on the severity of the winter.

257-3: Vegetation management direction on silver sagebrush, black sagebrush, and low sagebrush community management are addressed within several ACEC/RNA's, which are proposed to facilitate the study of the dynamics of these plant communities. A large percentage of the Guano Creek/Sink Lakes ACEC/RNA contains low sagebrush; another plant community cell is the silver sagebrush community. This area has been excluded from grazing for several years and presents an opportunity to study the dynamics of these plant communities without the disturbance of livestock or OHV activity.

This is also true for Foley Lake ACEC/RNA, which is representative of the black sagebrush community. It also contains all the other sagebrush types in the LRA. Two years ago, a wildland fire through part of the area created an excellent opportunity to study effects of fire on those communities. We have discussed with Oregon State University the possibility of studying the dynamics of the black sagebrush community (very little is known of the dynamics of this extremely shallow-soiled community). There is a tendency to ignore silver sagebrush in evaluations for management options. The ecological site inventory data, including soil data, could demonstrate the relationships between soil and other factors. All three of these plant communities have little or no cheatgrass, unless disturbed by fire. The prescription burns and wildland burns on Beatty Butte may also contribute to knowledge of low sagebrush fire dynamics.

Greater sage-grouse studies are contributing some data to the understanding of these communities; however, more studies need to be made, especially related to fire frequency in these plant communities and the effects of fire on these plants. Another aspect of research on the low sagebrush is the attention given to cultural plants by Tribal people. Much of their spring root crop areas exist on low sagebrush sites and little research has been done on those relationships.

257-4: Riparian conservation areas are delineated by their attributes on the ground. Given the current level of riparian mapping available, delineation of currently identified riparian conservation areas might lead to the incorrect assumption that if they are not mapped, they do not exist and do not need to be specifically managed. Riparian conservation areas would need to be identified prior to implementation of management actions or projects that may affect them. Also see response to comment 226-2.

across the landscape. We think a closer look at proposed OHV uses is in order based on national and Oregon OHV information:

According to the Bureau of Land Management's National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of the Interior Bureau of Land Management, January 2001:

"...recreational enthusiasts are buying motorized OHVs at a rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers of such vehicles."

"...motorized OHV-related funding and staffing have not kept pace with rising recreational use..."

"...substantially more law enforcement rangers and support resources are needed to ensure compliance with motorized OHV regulations."

Additionally, Terry Eccles, Oregon State All Terrain Vehicle (ATV) Coordinator, sent me information (10/8/01) stating that:

"50,000 ATV permits are sold each year in Oregon, and"

"The business world of ATV marketing and sales expects sales to increase between 15-20 percent per year over the next 5 years with most being first time users."

Therefore, we recommend OHV use be restricted to existing roads throughout the RA. Areas open to overland travel should be specifically designated. Looking at the alternatives, alternative C is the only one that appears to realistically address this daunting issue for land managers.

The following specific comments are organized by resource or resource program:

MONITORING

Pg. 3-6 "A detailed monitoring and evaluation plan would be published with the Proposed RMP/Final EIS." It is very important to include monitoring thresholds that will raise a flag, along with interagency/RAC review of monitoring results and management change recommendations. A rigorous monitoring plan is essential for a flexible management system to work. Without it, rigorous management standards and guidelines need to be implemented instead.

SHRUB/STEPPE

Pg. 2-7 "These communities remain a dominant ~~erect~~ ~~wheatgrass community for about 10 years, when sagebrush and rabbitbrush invade.~~" ODFW disagrees with this statement; there are numerous areas where seedlings are much older than 10 years that still have no diversity. Rabbitbrush is a native plant that is an early successional species that comes in after disturbance.

257-8

257-5: Several comments were received regarding using proper functioning condition instead of potential natural community or combinations of site potential ratings (also see response to comment 226-2). We have used the concept of desired range of future conditions to balance all aspects of a site, including stream channel and habitat conditions, as well as vegetation condition in relation to potential natural community. The potential natural community is a critical component of desired range of future conditions, and we will use the riparian score card process to determine potential natural community. See also the aquatic monitoring section in Appendix R.

257-6: Please see response to comment 257-5.

257-7: Based on input received during the public scoping and draft plan review comment opportunities, we are proposing changes in the OHV designations. Under the preferred Alternative D, approximately 1,771,019 acres (55.7 percent) would be within the open designation (see Table 4-5 and Map R-7).

The BLM has taken a close look at the issue of increasing OHV use. It is appropriate to close areas to OHV use if there are valid resource concerns. Under Alternative D, most of the North Lake Special Recreation Management Area is limited to existing roads and trails (see Map R-7). Under this change, most of the Sand Dunes WSA would remain open for off-road travel (see Map SMA-9a), and other SMA's would remain closed or limited to designated or existing roads and trails.

257-8: Please see corrected text in Chapter 2.

The addition of sagebrush and rabbitbrush to the system is a natural process, they are not invaders.

Pg. 3-12 Management Goal 1 # 2 We prefer Alternative C, Implement actions to diversify structure and composition of non native seedlings with emphasis on natural values and other resource objectives (i.e. wildlife) which may include reestablishment of native species.

Pg. 3-12 Management Goal 1 # 3 modify Alternative C Same as for Alternative A, but ~~native perennial and annual seed mixes will be used whenever possible~~

Pg. 3-12, 41-42 There appears to be some misinterpretation regarding the following statement "Areas burned by wildland fire, including those subsequently rehabilitated, would be rested from grazing through at least two growing seasons or until monitoring data or professional judgement indicate that health and vigor of desired vegetation has recovered to levels adequate to support and protect upland function". Some believe this means grazing could not occur prior to a minimum of 2 growing seasons others believe it could be less than 2 growing seasons. There also appears to be some confusion regarding the definition of a growing season. We utilize the NRCS recommendation of resting herbaceous seedlings until after the majority of the seedlings have shattered seed. In addition, the way this goal is written in the text it only applies to wildland fires, however in the table it says "reseeded areas", leading us to believe any seedlings those after prescribe fire or to restore habitat would be included.

In an attempt to clarify this goal we recommend a modified Alternative C for the Shrub/Steppe management goal 1, #4: ~~Areas burned by wildland and/or prescribed fire, or restoration, rehabilitation project areas would be rested from livestock grazing for a minimum of two full calendar years or longer until monitoring data or professional judgement indicate that health and vigor of desired vegetation has recovered to levels adequate to support and protect upland function.~~

Pg. 3-39 An important component that needs greater emphasis is inventories of range and forest conditions for risk of degradation. The threat of degradation could come in the form of wildfire on an existing condition, i.e., wildfire through a Wyoming sage overstory with a cheatgrass understory. This type of inventory should be part of your watershed analysis to determine degree of risk, management priority, and potential solutions.

Pg. 3-41 "Nonnative seedlings in poor to fair condition would be managed to ~~restore production and vigor, as well as~~ improve structure and species diversity consistent with other management objectives. Nonnative seedlings in good to excellent condition would be managed to ~~maintain seedling production~~, improve structural and species diversity, and maintain forage production."

Pg. 3-41 "Management actions would be implemented to rehabilitate and/or vegetate plant communities that do not meet desired conditions due to dominance by annual, weedy, ~~such as invasive, cheat grass, medusahead, crested wheat seedlings~~, or woody species such as invasive western juniper and decadent bitterbrush."

257-9: Please see revised Management Action 3 under Management Goal 1, Shrub Steppe section in Chapter 3.

257-10: See comment response 49-1 and 257-91.

257-11: Rangeland and juniper woodland conditions would continue to be assessed as the plan is implemented via rangeland health assessment, allotment evaluation, and watershed analysis processes, as well as during the evaluation of potential areas for restoration. Baseline conditions for most of the planning area have been documented by the ecological site inventory. During the standards for rangeland health assessment process, greater emphasis would be put on gathering current inventories of range and forest conditions for risk of degradation and condition of the plant communities in general. Soil data would be analyzed using risk analysis related to wildland fire, management priorities, and potential solutions.

257-12: The sentences in Chapter 3 have been changed to reflect your concern.

257-13: The sentence in Chapter 3 has been changed to reflect your concern. Also see the response to comment 272-7.

Pg. 3-41 A more complete discussion on what types of management uses and activities would be utilized to maintain and restore upland vegetation and soils conditions should be added. We would like mechanical treatment of sagebrush identified as a management option. There may be times when we need to mechanically treat sagebrush vegetation to improve sage grouse habitat.

RIPARIAN VEGETATION

See general comments above regarding potential natural community (PNC).

Pg. 2-8-10 Attaining PFC is extremely important, and is a very important first step towards improving riparian function. However, it must be noted that a riparian area can be in PFC, but still not provide adequate fish and wildlife habitat. We have observed this on numerous streams and site tours throughout the District. PFC can promote minimum and or detrimental habitat conditions for fish and wildlife.

Tables 2-3 and 2-4. A total of 36 streams are listed along with mileage, PFC, at risk etc. information. Fifteen streams are listed as meeting PFC criteria, but without any trend information? Are these streams improving or declining in fish and wildlife habitat value over time? Or are they remaining static? Have fish numbers increased and/or has fish distribution expanded?

Pg. 2-8 "Presence of these species can assist in determination of stream-site related to potential." While the presence of plant species can assist in determination of stream-site condition related to potential, the use of presence or absence of riparian plant species should not be the determining factor for designating site potential. The concern involves the designation and management of PNC sites. It is very possible that due to the absence of riparian plant species, PNC sites may be designated at a PNC less than its true or actual PNC. If this were to occur, the management strategies implemented would be designed to attain the lesser-designated PNC, not the true or actual PNC. Therefore, designation of a site at a lesser PNC would lead to management strategies that would exclude the long-term attainability of the true or actual PNC.

An example of this would be, a site that has had data collected from it showing that the site should be designated to include willow as a component of PNC, but due to the absence of willow is designated a sedge/graminoid site. The sedge/graminoid PNC is a designation less than its true or actual PNC, and would be managed to attain this designation. In this example since willow is not considered to be a component of PNC, adopted management strategies would most likely exclude the attainment of willow at this particular site.

The absence of willows from a particular site does not necessarily preclude them from the site indefinitely. Stream surveys conducted by Fremont National Forest found willows to be present throughout a relatively broad range of soil types and gradients. Natural disturbances such as high flows, flood events, fires and beaver activities would over time allow for willow colonization in areas where they are not currently present. The primary reason why willows are absent from many riparian areas is due to past management practices. Management strategies that allow willow growth or colonization over time are essential.

257-14: Mechanical treatment of sagebrush has been identified as an option under the alternatives. Refer to the Fire Management section in Chapter 3.

257-15: Per the proper functioning condition methodology, "A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lotic Areas" (USDI-BLM 1998i), only those areas in functional-at-risk condition are evaluated for trend; areas in functional and nonfunctional condition do not receive a trend rating. Few streams have had fish population assessment evaluations, the latest and most comprehensive of which were done by ODFW in determining response to the petition to list redband trout as threatened or endangered. As indicated in Table 2-23, stream habitat conditions have been determined on most stream reaches in the resource area. Stream surveys would be conducted periodically to determine trend in habitat conditions. Proper functioning condition should not be used to monitor stream habitat conditions. See also comment response 257-5.

Pg. 2-10 "Starting in 2000 and continuing in 2001, a riparian score card is being developed that accesses the current interactions of soils, vegetation and stream channel. These cards will be used to compare current conditions to potential conditions for that site. In the future, once the cards are completed, this information will be used to describe desired range of conditions on each site." We support this move toward a potential natural community (PNC) survey and would like to participate in reviewing and commenting on the PNC protocol, survey results and management applications derived from the surveys. These score cards and survey need to be identified as a resource management action for the riparian/wetland vegetation section, management goal-restore, maintain, or improve riparian vegetation, habitat diversity, and associated watershed function to achieve healthy and productive riparian areas and wetlands.

257-16

Pg. 3-14 modify Alternative D *No new livestock water development in intact playas and lakebeds. collect baseline data on all developed playas/lakebeds and restore some of these playa lakebeds.* The forb components on these playa lakebeds provide important sage grouse brood rearing habitat. We would like to work with you to restore some of these playa lakebeds that have substantial forage value for sage grouse.

257-17

Pg. 3-13 Management Goal #1 modify Alternative C: Identify and delineate *Manage* riparian conservation areas *to progress toward the attainment of potential natural community.* Identify, delineate and evaluate impacts to riparian conservation areas prior to management activities.

#2 modify Alternative D: "allow progress toward attainment of proper-functioning-condition *potential natural community* and riparian management objectives."

#3 modify Alternative A: "Restoration projects would be implemented in those areas where conditions are not naturally recovering or are currently functioning but are at risk of degradation. *Active restoration projects will be preceded by changes in management activities.*"

Pg. 3-14 #4 modify Alternative D "Implement or maintain grazing systems that promote the recovery or maintenance of riparian systems to desired range of conditions based on site *potential potential natural community.*"

#7 modify Alternative D Remove *or redesign and maintain* ~~from~~ roads impacting riparian conservation areas any roads that are impacting the stream and/or riparian zone.

FOREST WOODLANDS

257-18

Pg. 3-49 Add the following areas for juniper treatment in bighorn sheep habitat "Invasive western juniper would be treated using prescribed fire or mechanical cutting on 12,000-25,000 Juniper treatments *Hadley herd range, Fish Creek Rim, S. Warner Rim, Coleman Rim, S. Abert Rim, Devil's Garden and East Lava Field (Squaw Ridge).* Treatments would reduce invasive western juniper by 30-70 percent within each of these areas over the life of the plan." These areas are identified to enhance and/or restore bighorn sheep habitat. The shrub component within these areas is an important component of bighorn sheep habitat. It is important to remove juniper while maintaining and protecting some of the shrubs. Therefore, we want to emphasize the use of mechanical treatment where possible within these areas and want to be involved in the planning

257-16: Table 3-1 has been moved to Table S-1 and amended.

257-17: Table 3-1 has been moved to Table S-1 and amended to reflect your concerns.

257-18: The BLM has modified the document to reflect your proposed changes for the Forest Woodland section. Normally, mechanical removal of juniper from aspen stands having a significant shrub component would be the favored treatment method. Prescribed fire would be used, however, to regenerate declining aspen stands, which could result in a loss of bitterbrush in some areas. ODFW would be consulted prior to implementation of such projects to help plan or review proposed, site-specific aspen treatment projects and methods.

of these projects. While this section specifically identifies bighorn sheep habitat for restoration and enhancement we encourage you to identify additional restoration and enhancement of the shrub, grass and forb components within juniper stands to benefit populations of all shrub steppe dependent species such as pronghorn, greater sage grouse and neotropical migrants.

Pg. 3-49 "All quaking aspen stands in the planning area with invasive western juniper would be treated early in the life of the plan." We support the restoration and enhancement of aspen stands. However, some of these aspen stands are located in mule deer winter range. The shrub component, particularly bitterbrush, within these areas is an important component of mule deer winter range habitat. It is important to remove the juniper while maintaining and protecting the shrubs. Therefore, we want to emphasize the use of mechanical treatment where possible within areas with concerns for bitterbrush. We would want to be involved in the planning of these projects.

257-19

Pg. 3-15 states "Treat on up to 50% of the early to mid-successional stands would be treated..."
Pg. 3-49 states "Up to 75% of the early to mid-successional stands would be treated..." Which is correct 50 or 75% for treatment of early to mid successions stands. Are these percentages the amount of acres that will be treated or is it the amount the stands would be reduced by? We support the restoration and enhancement of the shrub, grass and forb components within these juniper stands because it will benefit populations of all shrub steppe dependent species. However, these juniper stands provide important thermal and hiding cover on mule deer winter range habitats. Within mule deer winter range, cover concerns need to identify and cover habitat maintained during the planning and implementation of treatments and commercial uses. We would be willing to assist in the planning of these projects.

Map V-2 identifies portions of the Fort Rock & Silver Lake mule deer winter ranges for rangeland health projects. We would like to identify these as mule deer winter range habitat enhancement and/or restoration priority areas. In addition, we want to work with the BLM biologists to identify additional areas within the RA for mule deer, bighorn sheep, pronghorn and greater sage grouse habitat enhancement and/or restoration to be included in map V-2.

WATERSHED RESOURCES/WATERSHED HEALTH

See general comments above regarding potential natural community (PNC).

257-20

Pg. 3-18, 23-25 The LRMP mentions DEQ, the Clean Water Act, TMDLs and beneficial uses but not the Oregon Plan. The Governors Oregon Plan and the overall objective for state agencies under the plan should be mentioned within the document. A good location for this would be somewhere within pages 2-23-27 where BLM discusses DEQ and WRD statutes and policy and/or pg. 1-11 where BLM mentions the consistency with the State of Oregon's statewide planning goals. The purpose of the Oregon Plan for Salmon and Watersheds (the Plan) as stated in the Plan and reaffirmed in Executive Order No. EO 99-01 is to restore Oregon's wild salmon and trout populations and fisheries to sustainable and productive levels that will provide substantial environmental, cultural, and economic benefits and to improve water quality. The overall objective for state agencies under the Plan and this Executive Order is to protect and

257-19: Alternative D has been modified to show treatment of up to 50 percent of all juniper woodlands. This refers to acres treated by fire, wood cutting, mechanical or other treatment. ODFW would be consulted on proposed juniper treatment areas, especially when located in deer winter ranges.

257-20: The "Oregon Plan for Salmon and Watersheds" has been added in Appendix B.

restore salmonids and to improve water quality. ODFW plays a major role in the Oregon Plan for salmonids and watersheds.

DEQ and the TMDL will more or less dictate riparian land management on federal lands. TMDL has been designed to promote/improve the beneficial uses on a watershed/subwatershed/stream basis. Beneficial uses include salmonid and resident fish habitat as well as wildlife and hunting. The TMDL Plan in Klamath Basin has incorporated PNC in its management directives. Once the TMDL is completed in Lake County, BLM will need to adjust the management of its riparian lands to fit the TMDL, if found necessary. Adopting site potential or a PNC riparian type management criteria will change the current riparian management for the better and will promote/improve fish and wildlife habitat and water quality parameters.

257-21

Pg. 3-56 Management uses and activities would be the primary tool for maintenance and restoration of upland vegetation and soils conditions, *however enhancement and restoration projects would be implemented in those areas where conditions are not naturally recovering.* A more complete discussion on what types of management uses and activities would be utilized to maintain and restore upland vegetation and soils conditions should be added.

257-22

Pg. 3-55 "high priority watersheds as Honey, Twentymile, Bridge (sub), Buck, Guano Valley and Alkali Lake." **Page 3-56** Alternatives C and D identify the Sheeprock allotment as a priority watershed (habitat). Is this an additional watershed or is the Sheeprock allotment within one on the high priority watershed?

257-23

Page 3-18 Management Goal 2 #1 Table states Alternative C and D are the same, but in the text on **page 3-58** they are different:
"Public uses would be allowed along streams and around other waterbodies,..."
Alt. C "...as long as State water quality standards are either attained at the same or greater rate than if the use or activity were absent." *(This statement is repeated.)*
Alt. D "...as long as there is measurable progress toward attainment of State water quality standards." We prefer Alternative C.

257-24

Page 3-18 Management Goal 2 #4 Table states Alternative C and D are the same but in the text **page 3-58** they are different:
For streams with water quality limited segments,
Alt. C "...uses and activities would be allowed in the watershed only if they would promote or have no effect on restoring water quality standards."
Alt. D "...management activities would be implemented with the intent to restore water quality to the minimum level. We prefer alternative C.

257-25

Pg. 3-59 modify Alternative D Rehabilitation should be included. " Management within streams and riparian conservation areas would focus on uses and activities which allow for the protection, maintenance and *rehabilitation* of riparian conservation areas and upland watersheds, and measurable progress toward attainment of water quality standards and *proper functioning condition potential natural community.*

257-21: The text has been changed to reflect your concern.

A description of grazing management has been added to the Best Management Practices section (Appendix D) to better describe management uses that would be utilized to maintain and restore upland vegetation and soil condition.

257-22: Table 3.1 has been moved to Table S-1

The Summary of Resource Management Actions by Program, Water Resources Management Goal 2, Management Action 4, Alternative C section has been changed to reflect achievement toward standards that would occur at the same rate with or without the management uses or activities. Alternative D would make progress toward achievement of the standard.

257-23: The text has been changed to reflect your concern.

257-24: The text has been changed to include the concept of potential natural conditions for Alternative C and desired range of condition for Alternative D. Please see responses to comments 257-5 and 257-6 for a clarification on the use of proper functioning condition, potential natural vegetation, and range of desired conditions.

257-25: The text has been changed to reflect your concern. Please see responses to comments 257-5 and 257-6 for a clarification on the use of *proper functioning condition, potential natural vegetation, and range of desired conditions.*

Pg. 3-18 Management Goal 2 #1 modify Alternative C ...allow progress toward the attainment of State water quality standards *and allow advancement towards potential natural community.*

#4 modify Alternative C ...if they would promote or have no effect on restoring water quality to State water quality standards *and allow advancement towards potential natural community.*

FISH AND AQUATIC HABITAT

See general comments regarding potential natural community (PNC).

Pg. 2-27 "Large wood, while not meeting standards in the 1995 "Interim-Inland Native Fish Strategy for the Intermountain, Northern, and Pacific Northwest Regions" is usually not a factor in determining function of the streams. Most sites on BLM-administered land naturally do not have an adequate source of large wood." ODFW disagrees with these statements. Quotes from the document include page 2-10 "At one time, cottonwood was probably more prevalent but at present it does not occur widely in Lake County." And on page 2-8 "Cottonwood deserves special consideration when managing riparian vegetation. Many cottonwood stands have declined in the area. Remnant stands can be found that have little to no regeneration, while some stands can be identified only by the remaining dead and down trees." *While Cottonwood does not occur widely in Lake County at this time, we believe historically that they were more prominent. Cottonwoods, in conjunction with Aspen and Willow provide leaf drop and large wood and play a critical role in proper natural community and provide and improve fish and wildlife species and habitat and water quality parameters.*

Pg. 2-27 "Currently, all stream liberation of hatchery trout has been discontinued by ODFW." *Currently, stream liberation of hatchery trout occurs only on Ana River by ODFW.*

Pg. 2-27 "ODFW no longer routinely stocks warm-water fish species, but smallmouth largemouth bass, ..."

Pg. 2-28 Add *Squaw Lake* to the list of stock lakes.

Pg. 3-62 Roads would be managed in riparian conservation areas to improve conditions. Roads may be removed and/or relocated where it is determined that they are contributing too less than desirable conditions. Road construction and maintenance would follow BMP to minimize sediment input and channel effects. Does this mean roads can be built in riparian areas?

Pg. 3-19 Modify Alternative C Management Goal #1 ... self-sustaining aquatic communities *by changes in riparian management as well as active restoration projects*

Pg. 3-19 Modify Alternative C Management Goal #2 ...attainment of aquatic habitat objectives *or if they promote progress toward attainment of PNC*

Pg. 3-19 Modify Alternative C Management Goal #5 ...maintenance of riparian conditions *that promote improvement or maintenance of riparian conditions to standards based on PNC*

257-26: The text has been changed to include the concept of potential natural conditions for Alternative C and desired range of condition for Alternative D. Please see responses to comments 257-5 and 257-6 for a clarification on the use of *proper functioning condition, potential natural vegetation, and range of desired conditions.*

257-27: Cottonwood is under-represented on many streams in the planning area; however, large wood does plays a different role in many streams in the LRA. For example, due to flows in the confined (rock-lined) canyons of Deep, Twelvemile, and Honey Creeks, large wood moves through the system and is not as important in protecting stream banks as on other stream systems with softer shorelines.

257-28: The suggested changes have been made to the text.

257-29: In Alternative D, roads could be built in the riparian conservation areas if they still allowed progress toward water quality standards and utilized BMP's. Changes have been made to the text for clarity.

257-30: Table 3-1 has been moved to Table S-1 and amended as follows:

Under Management Action 1, Alternative C, the intent of this action is to concentrate management on native species habitat and to allocate some resources to other values—not to specify management or restoration.

Under Management Action 2, Alternative C, aquatic habitat objectives include potential natural community as a part of desired range of future conditions.

Under Management Action 5, Alternative C, potential natural community is a part of definition of site potential.

WILDLIFE AND WILDLIFE HABITAT

Pg. 2-31 Priority wildlife habitats include streamside riparian, springs, seeps, wet meadows, seasonal wetlands, playas, and lake beds, *silver sage dominated playas*, cliffs, caves, talus slopes, *lava beds*, dry meadows, dryland shrubs, juniper woodlands, ponderosa pine forests, mixed conifer forests, and quaking aspen groves. The list in Appendix H page 223 is different. It should include all the habitats listed on page 2-31. Additional descriptions and discussions of the missing habitats and the ones we identified need to be added to Appendix H.

257-31: Text changes have been made as suggested.

Pg. 2-32 "Habitat on BLM administered lands is primarily winter range while summer and transitional range is on USFS lands", *however, in the northern portion of the RA elk utilize BLM lands year round*

257-32: Text changes have been made as suggested.

Pg. 2-32 "Mule deer most numerous, adaptable, and widely distributed big game species in the LRA. There is no mention of mule deer habitat. *Mule deer use all vegetation types within the RA*

Pg. 2-32 Approximately, 3,000-5,000 pronghorn currently use the planning area throughout the year. However, ODFW indicates that pronghorn populations throughout Oregon, including the planning area, have declined 20-30 percent since 1991. *Pronghorn populations fluctuate depending on environmental conditions and range from 1,000-7,000 on the Lakeview Resource Area.*

Pg. 2-32 and A-235 Pronghorn habitat consists primarily of Wyoming big sagebrush and low sagebrush lands *shrub steppe vegetation types*

Pg. 2-32 and A-235 There are approximately 500-800 California bighorn sheep at various locations.

Pg. 2-35 and A-235 Water is a limiting factor and is supplied by big game guzzlers, natural seeps and springs, and waterholes?

Pg. 3-63 We prefer Alternative C. Currently there are no open range sheep allotments in the LRA. Rather than the 9 mile buffer, ODFW recommends that no domestic sheep open range grazing be allowed within the LRA. Any new sheep allotments would conflict with established existing populations and in the reestablishment of meta-populations of bighorn sheep in the LRA. Example: Sheeprock, Diablo and Cogan sheep have been observed in the deserts areas between bighorn use areas, this movement between populations has been confirmed by ear-tag identification and telemetry data.

257-33: Text changes have been made as suggested.

Pg. 3-63 Add the following areas for juniper treatment in bighorn sheep habitat "Invasive western juniper would be treated using prescribed fire or mechanical cutting on 12,000-25,000 Juniper treatments *Hadley herd range*, Fish Creek Rim, S. Warner Rim, Coleman Rim, S. Abert Rim, *Devil's Garden and East Lava Field (Squaw Ridge)*. Treatments would reduce invasive western juniper by 30-70 percent within each of these areas over the life of the plan." These areas are identified to enhance and/or restore bighorn sheep habitat. The shrub component within these areas is an important component of bighorn sheep habitat. It is important to remove juniper

257-34: Refer to comment response 257-18.

while maintaining and protecting some of the shrubs. Therefore, we want to emphasize the use of mechanical treatment where possible within these areas and want to be involved in the planning of these projects. While this section specifically identifies bighorn sheep habitat for restoration and enhancement we encourage you to identify additional restoration and enhancement of the shrub, grass and forb components within juniper stands because it will benefit populations of all shrub steppe dependent species such as pronghorn, greater sage grouse and neotropical migrants.

257-35 | **Pg. 3-63 Management Goal 2 and Pg. 3-65 Management Goal 4** No monitoring programs are identified for these two management goals. Monitoring is essential for a flexible management system to work and to determine if the management direction is progressing toward the attainment of the LRMP goals.

257-36 | **Pg. 3-64 Alternative C** in the text states "this would apply to all native range or seeded areas in big sagebrush habitats throughout the planning area." While the table on page 3-20 states "meet desired range of conditions in most big sagebrush habitats throughout the planning area." It does not list "seeded areas". Alternative D text and table states "the same as C except that desired range of conditions would apply to all areas in big sagebrush habitats throughout the planning area." This is very confusing and needs to be clarified. While we understand the need to highlight some habitat types as priorities, we would like you to identify management options for other habitat types. In addition, to modified grasslands, management options for annual grasses such as cheat grass and medusahead need to be identified.

Page 3-65 Management Goal 3 modify Alternative C: We support the restoration and enhancement of the shrub, grass and forb components within these juniper stands because it will benefit populations of shrub steppe dependent species.

257-37 | **Page 3-65 Management Goal 3 modify Alternative C:** In ~~erueial~~-wildlife habitat such as ~~mule~~ deer winter range ~~bighorn sheep~~ and greater sage-grouse ~~habitats~~, (see Map W-1 and -2), new right of way would be avoided. OHV's ~~use throughout the RA~~ would be limited to existing roads and trails ~~unless designated open~~. The Cabin Lake/Silver Lake Mule Deer Winter Range Cooperative Road Closure area would be expanded by 34,374 to 100,834 acres. Vehicle use would be limited to designated roads from Dec. 1 to March 31. See Map R-6.

257-38 | **Pg. 3-65 Bighorn sheep and elk** have been reintroduced into the planning area. ~~Elk are endemic to Lake County and have been naturally expanding since mid 1970's~~

257-39 | **Pg. 3-65** The text states "Livestock grazing use within ~~erueial~~ mule deer or pronghorn winter range would not be allowed to exceed an average of 30-percent ~~≤ 15 percent~~ of the current year's growth of ~~bitterbrush~~ browse." While the table on Pg. 3-21 states "... of the current year's growth of browse." In general, we are opposed to fall grazing in mule deer winter ranges because of the impact to the shrub component. Allotments identified within mule deer winter range, (See Appendix E comments), with fall grazing need to be carefully monitored for browse utilization. While we appreciate your attempt to limit livestock utilization to 30 percent we would like to recommend less than or equal to 15 percent of the current year's growth on browse species within winter range.

257-35: Monitoring programs have been identified for these two management goals. Refer to Appendix R.

257-36: Text changes have been made to clarify this section.

257-37: Text changes have been made to clarify this section.

257-38: Text changes have been made to clarify this section.

257-39: Browse utilization levels have been revised to not to exceed 15 percent use by livestock within winter range allotments 2 out of 3 years to provide 2-year-old wood to set seed. If utilization exceeds 15 percent utilization, the BLM would coordinate with ODFW through the allotment evaluation process and make needed adjustments and/or modify or install grazing systems to address these concerns. We removed the statement "There is no turnout prior to April 15 each year in the 0700 series allotments . . .", since there are some deviations. Mule deer winter range concerns are identified in the individual allotment summaries (Appendix E1). Conflicts with early spring use grasses in the fall/winter allotments would be analyzed on a case-by-case basis through the allotment evaluation process with input from ODFW.

257-40

Pg. A-223 "Shrubs are absent from wet meadows in proper functioning condition potential natural community except along the margins, although some meadows may have willows present."

257-41

Pg. A-224 "Proper functioning condition ratings have been completed on 126,000 acres of wetlands in the LRA or 93 percent completed. Attaining PFC is extremely important, and is a very important first step towards improving wetland function. However, it must be noted that a wetland area can be in PFC, but still not provide adequate fish and wildlife habitat. PFC can promote minimum and or detrimental habitat conditions for fish and wildlife. See the discussion in the general comments above regarding PNC."

257-42

Pg. A-225 "These three areas occupy 56 percent of the wetlands in the planning area with the remaining 45 percent spread across the resource area. These allotments range from 40 of the allotments with less than 50 acres of wetlands, 37 allotments with 50 to 999 acres, 11 allotments with 1,000 to 4,000 acres 1 with 8,000 acres, and 1 with 15,000." This needs to be clarified; it appears some text may be missing.

257-43

Pg. A-226 "Competition between domestic livestock and wintering mule deer for bitterbrush and early green up grasses has been minimized in the Fort Rock/Silver Lake mule deer winter allotments through turn-out date adjustments. There is no turnout prior to April 15 each year in the 700 series allotments. This addresses the early green up grasses portion. What has been done for the bitterbrush portion of this statement? In addition this management direction needs to be implemented for the following allotments: all 200, 400 and 900 series, All 500 series between Plush and Adel, 517, the portion of 100, 101, 102 and 103 north of the Christmas Valley-Wagontire Road, 1000 and the SE corner of 600."

257-44

Pg. A-226 "...and/or they are located in areas where cheatgrass, rabbitbrush, or noxious weed invasion is likely. Rabbitbrush is a native shrub that is an early successional species that comes in after a disturbance. It should not be included with invasive species."

257-45

Pg. A-231 "...many successfully nest in suitable wetland habitats throughout the RA in Warner Valley, Summer Lake Basin and the Chewaucan Marsh..."

257-46

Pg. A-232 "The greater sandhill crane...It is an occasional spring/fall migrant throughout the resource area a common resident that migrates out of the area for the winter and has been seen nesting in appropriate habitats throughout the resource area." The major nesting areas in Lake County are Summer Lake, Paulina Marsh, Chewaucan Marsh, and Camas Valley. The lesser sandhill crane is a common spring/fall migrant throughout the resource area.

257-47

Pg. A-233 Rocky mountain elk: "The management objective for units within the resource area call for 1,000 elk in the Paulina E. Fort Rock units, 3,000 elk in the South Central Region Zone

257-40: We modified text throughout the document, explaining that proper functioning condition is a minimum standard and management direction will be guided toward desired range of condition, which recognizes structure and form as opposed to potential natural community.

257-41: Please see response to comment 257-40.

257-42: The text has been changed to clarify this section.

257-43: Please see response to comment 257-39.

257-44: Please see response to comment 257-8.

257-45: The text has been changed to correct this discrepancy.

257-46: When revisions to ODFW mule deer and elk management plans are complete, the BLM would incorporate changes in population management levels at the land use plan level through plan maintenance and at the activity plan level on a case-by-case basis during rangeland health assessments and allotment evaluations.

257-47: Text changes have been made as suggested.

(includes the Fort Rock, Silver Lake, Interstate, *Sprague and Klamath Falls* units), 500 elk in the Warner Unit, and 1,000 elk in the High Desert Unit Zone (includes the Beatty Butte, *Wagonfire* and the Juniper units within the resource area; Steens Mountain, Whitehorse, Owyhee and *S. Mathews* units that fall outside lands administered by the LRA).

257-48 Pg. A-233 Rocky mountain elk: "Winter range is an important consideration in managing elk populations. (Map W-2)" Map W-2 shows year long elk habitat.

257-49 Pg. A-233 Rocky mountain elk: Monitoring of these elk by ODFW is continuing. We are no longer monitoring these elk.

257-49 Pg. A-234 Mule deer: The majority of mule deer found on the resource area are part of the migratory Interstate deer herd. This herd migrates seasonally, generally wintering in Modoc County in California, and summering in Lake and Klamath County, Oregon, or migrating from Crater Lake, Oregon, and wintering in Lake County. There are also local herds that reside year-round in Lake County, usually near agricultural areas. This entire section needs to be deleted, it is incorrect.

257-50 Pg. A-234 Mule deer: "...set management objectives for the Lake County deer units within the resource area for post-season..." "The management objectives for the Lake County deer units within the resource area are as follows: Fort Rock, 4,200; *W. Paulina*, 11,200; Silver Lake, 10,300; Interstate, 14,800; Warner, 5,500; Wagonfire, 1,400; *South Paulina*, 11,000; Beatty Butte, 2,300 and the Juniper, 2,300.

257-50 Pg. A-234 Mule deer: "Approximately 1,000,000 acres of crucial deer winter range..."

257-50 Pg. A-234 Mule deer: "Elevations within the resource area Interstate herd boundary vary from 4,400 feet on the southern portion of the winter range in California to 2,200 feet at the *Summer Lake winter range* to over 7,918 feet at *Beatty Butte* over 8,400 feet in the forested mountains within Lake County. The range of the Interstate herd *Mule deer range* is divided into..." "Summer ranges of the Interstate herd are generally..."

257-51 Pg. A-235 Mule deer: "Acquiring private lands within the crucial deer ranges..." "Allocating forage for deer on the crucial deer winter range," "Improving and maintaining transition and crucial winter range,"

257-52 Pg. A-235 Mule deer: Current management on the resource area has focused on the following: The last item identified is prescribed burning. Mechanical treatments need to be identified.

257-53 Pg. A-235 Pronghorn "Populations in Oregon have declined 20-30 percent since 1991 due to limitations in habitat, weather conditions, poor nutrition, disease and predation. Approximately 3,000 to 5,000 pronghorn use the LRA on approximately 1,000,000 acres of identified crucial winter habitat." *Pronghorn populations fluctuate depending on environmental conditions and range from 3,000-7,000 on the Lakeview Resource Area. Approximately 1,000,000 acres of identified pronghorn habitat exists in the LRA.*

257-48: Text changes have been made as suggested.

257-49: Text changes have been made as suggested.

257-50: Text changes have been made as suggested.

257-51: Text changes have been made as suggested.

257-52: Text changes have been made as suggested.

257-53: Text changes have been made as suggested.

257-54

Pg. A-236 Bighorn Sheep "Hart Mountain National Wildlife *Antelope* Refuge, or the 100 found on Winter Rim. Lake County *The resource area* contains historically occupied suitable habitat" "... Hart Mountain National Wildlife *Antelope* Refuge..."

257-55

Map W-2 Some bighorn sheep habitats are missing from this map, we would like to meet with you to correct this map. In addition, we are in the process of reevaluating the bighorn sheep plan. The intent is to move toward the supplementation of existing herds to improve genetic mixing and/or expand ranges. We want to meet with you to update map W-2 to expand areas for establishment of meta-populations.

SPECIAL STATUS ANIMAL SPECIES

257-56

Pg. 2-35 and A-227 Surveys over the years found only one bald eagle nest on BLM, on USFS within 1 mile of BLM and 1 on private surrounded by BLM. *however, at least six bald eagle nesting pairs utilize BLM lands for foraging.*

Pg. 2-35 and A-227 "Bald eagles forage in the winter on BLM, USFS and private lands in the Fort Rock, Silver Lake, Christmas, Paulina Marsh, Summer Lake, Warner, Goose Lake, Crooked Creek, and Chewaucan Marsh Valleys.

Pg. 2-36 and A-228 Pagel surveyed all suitable nesting habitats in 1999 *on the RA* and found no active peregrine nests *on BLM lands* (Pagel 1999).

Pg. 2-36 and A-229 Big sagebrush, the primary species grouse depend on in Lake County, is usually associated with western juniper, although juniper is not necessarily a habitat component. *In Lake County, the greater sage grouse depends on vegetation types with a sagebrush component.*

Pg. 2-36 Add to end of greater sage-grouse paragraph. *Beginning 1994, lek surveys have been completed following a systematic statistically valid sampling protocol in order to be able to estimate populations within the RA.*

Pg. 3-66 and A-229 "Management of greater sage-grouse would be in accordance with current BLM management strategies as outlined in the "Greater Sage-grouse and Sagebrush-Steppe Ecosystems Management Guidelines"(2000). The BLM is currently part of a working group developing a long-term conservation strategy plan for OR and WA which would be completed in the next 12-18 months." The LRMP may well be completed prior to the new "OR long term sage grouse and sage grouse habitat conservation strategy". How will BLM implement this new strategy? Will it become a part of the LRMP once it is completed? All other resources need to make sure their alternatives address and are in compliance with the new strategies when it becomes available.

257-57

257-58

Map W-1 Some sage grouse leks are missing from this map, we would like to meet with you to correct this map. In addition, we are in the process of completing surveys for all of RA.

257-54: Text changes have been made as suggested.

257-55: The big game habitat data, including that for bighorn sheep, has been updated (refer to Map W-2).

257-56: The text has been changed as recommended.

257-57: The following sentence has been inserted after the discussion of stepping-down the results of ICBEMP to application at the field level, "Upon completion of the conservation assessment and strategy plan for greater sage-grouse, the RMP would be amended, either directly or through the plan amendment process, to include long-term management guidelines for greater sage-grouse."

257-58: Updates to this map from 2000-2001 survey data have been added to Map W-1. As mentioned in the "Management Guidelines for the Greater Sage-Grouse and Sagebrush-Steppe Ecosystems" (Sage Grouse Planning Team 2000), greater sage-grouse information would be revised and updated on an annual basis.

Therefore, we would like to be able to update the greater sage grouse information on Map W-1 as we complete these surveys.

LIVESTOCK GRAZING MANAGEMENT

Pg. 3-68 "The intent of grazing management is to leave sufficient herbaceous material in most areas to provide soil and watershed protection, to provide forage and cover for wildlife and wild horses, and to meet other resource objectives."

Pg. 3-68 "Known problems pertaining to livestock grazing are not related to existing forage allocation, but need changes in management such as season of use." In general we agree with this statement however, in some instances there may be problems with forage allocations. No recommendations regarding what these changes may be if needed?

Pg. 3-68 Under Common to Alternative A-D: It states: "Areas burned by fire would be rested a minimum of 2 growing seasons before they are reopened to livestock grazing." This is inconsistent with the minimum of two years under Alternative C the shrub/steppe resource section. It states a minimum of 2 years. As stated under the general comments we support resting seedlings a minimum of 2 years before they are reopened to livestock grazing"

Pg. 3-70 "Forage utilization would not exceed moderate (50 percent)." This is inconsistent with the 30% utilization standard listed under wildlife section for winter range. As stated above we recommend browse utilization within mule deer and pronghorn winter range should be less than 15 percent.

APPENDIX E

Pg. 3-21 Management Goal 4 #2 "Livestock grazing use within deer or pronghorn winter range would not be ~~allowed to exceed an average of 30 percent~~ 15 percent of the current year's growth of browse." This is especially critical in allotments with fall grazing where browse utilization needs to be carefully monitored. This resource conflict/concern and management direction needs to be identified under for the following allotments: all 200, 400, 700 and 900 series, All 500 series between Plush and Adel, 517, the portion of 100, 101, 102 and 103 north of the Christmas Valley-Wagontire Road, 1000 and the SE corner of 600.

The greater sage grouse resource conflict/concern and management direction needs to be identified for the following allotments: 404, 405, 406, 412, 423, 433, 516, 529, 530, 531, 600, 1000 and 1001. Allotment 433 includes the Sharp Top seeding and was sage grouse habitat prior to the burn and on occasion sage grouse have been observed in the seeding. Therefore, we recommend adding the sage grouse statement to this allotment.

Additional bighorn AUMs need to be added to allotments: 100, 101, 102, 514, 519, 520, 522, 217, 216, 222, 404, 416, 424, 427, 905, 907, 908, 910 and 914.

Pg. 2-41 Wildlife Forage Allocations Table 2-26. The forage allocations for deer and pronghorn are separated from other wildlife in the table. However in Appendix E allotment

257-59: The paragraph was changed to reflect your concern.

257-60: The paragraph was amended to reflect your concern.

257-61: Please see response to comment 49-1.

257-62: The paragraph was changed to clarify utilization level differences between herbaceous and browse.

257-63: See comment response 257-39.

257-64: We identified greater sage-grouse conflicts/concerns in allotment specific summaries for allotments containing greater sage-grouse (see Appendix E1).

257-65: The additional bighorn sheep AUM's identified by ODFW have been added in the allotments (see Table 2-26 and Appendix E1).

257-66: The wildlife allocations in the allotment summaries in Appendix E1 have been separated out for mule deer, pronghorn, elk, bighorn sheep, and other wildlife to reflect allocations shown in Table 2-26.

management summaries, deer and pronghorn AUMs are added to and listed under other wildlife. This needs to be corrected.

WILD HORSES

257-67 Page 3-23 states implement and revise where needed, existing herd management area plans, for all alternatives. Pg. 3-71 Management Common to All Alternatives This section does not refer to revising herd management objectives when needed as on pg. 3-23.

257-68 Pg. 3-71 Alternative A Approximately 9,000 acres (2 percent) of the Beaty Butte Herd MA is recommended for prescribed burning to improve ecological condition. However, this is not listed under alternative B-D. Is this recommendation from the herd management plan? If yes, would it follow through the other alternatives? Due to the recent 60,000 plus acre wildfires that have occurred in the Beaty Butte Herd MA we are concerned with and cannot support additional prescribed fire in the vicinity of Beaty Butte.

257-69 Pg. 3-71 Management Common to Alternative A-C Forage allocations would be 1,320 AUM in Paisley and 3,000 AUM. This is incorrect these do not apply to alternative A only alternative B-D.

Pg. 3-71 Management Common to Alternative B-D We support the recommendation to identify a total of 31,859 acres in the northwest corner to be maintained as an unoccupied herd area.

Pg. 3-72 Alternative D We do not oppose increasing the maximum appropriate management level by 40 animals within the Paisley Herd MA. We understand this increase reflects extending the timeframe between gathers to 5 years consistent with the gather cycle in Beaty Butte Herd MA. However, it is important that both the Paisley and Beaty Butte herds be managed within these appropriate management levels.

SPECIAL MANAGEMENT AREAS

257-70 We have concerns regarding the ACEC designations. Some of the road closures within the new ACEC/RNA's restrict access to guzzlers, greater sage grouse leks and wildlife inventory areas such as upland bird and greater sage grouse brood routes, winter bald eagle survey and mule deer herd composition count. As designated the ACECs may impact our ability to manage wildlife populations and BLM's and ODFW's cooperative ability to manage wildlife habitats. We would like to meet with you to discuss these concerns prior to the adoption of the final LRMP.

257-71 Avoid disturbance to nesting raptors during the nesting season (Jan-Aug, depending on species), especially Lost Forest, Lake Abert and Rim, Black Hills, Conaley Hills, Fish Creek, Hawkste/Walksie and Table Rock throughout the LRA. This should be moved to the wildlife section of the plan and all other resource sections need to make sure their alternatives address and are in compliance with this recommendation during management activities.

CULTURAL AND PALEONTOLOGICAL RESOURCES

257-67: Herd management area plans and potential revisions are discussed in the first paragraph of the Management Common to All Alternatives section.

257-68: This objective is from the "Beaty Butte Allotment Management Plan/ROD" (USDI-BLM and USDI-USFWS 1998b), not the herd management plan. The additional prescribed fires would not be in the vicinity of Beaty Butte, but in other portions of the allotment/herd area.

The 9,000 acre proposed prescribed fire was from a previous planning document and was not carried over to the other alternatives (Alternatives B-D). There are other prescribed fires planned in the "Beaty Butte AMP/ROD" (USDI-BLM and USDI-USFWS 1998b), but with the scope and size of the recent fires on the Beaty Butte Allotment, these projects are on hold for the time being.

257-69: The error has been corrected.

257-70: We met with ODFW and reevaluated the road closures within the ACEC's, those accessing ODFW survey routes and trend lek sites and those accessing guzzlers that require minimal maintenance or could be removed or relocated. Refer to Maps SMA-5 to SMA-32. We would continue to coordinate with ODFW in the future to determine which guzzlers could be removed or relocated to increase wildlife benefit.

257-71: This topic is covered in the Appendix H2: Wildlife and Wildlife Habitat of the Lakeview Resource Area. In addition, it is also covered by existing laws, such as the "Migratory Bird Treaty Act" of 1918 (as revised) and the "Eagle Protection Act" of 1963 (as revised). We reviewed these sections to make sure their intents are clear to the reader.

257-72

Pg. 3-101 What is Traditional cultural property designation? How will management and/or use be effected by the designation?

HUMAN USES AND VALUES

257-73

Pg. 2-68 ~~No commercial feedlots operate in Lake County or Harney County. There are several commercial feed lots for replacement dairy heifers in the Fort Rock Valley.~~

257-74

Pg. 3-105 Alternative D ~~Commodity use would be reduced from existing levels to increase the level of protection for natural values.~~ Under alternative D grazing remains the same and increased commercial use of juniper is recommended therefore, we disagree with this statement.

257-75

Pg. 3-105 Alternatives C and D "North Lake County Special Recreation Management Area to emphasize undeveloped dispersed recreation opportunities and protect natural value. Minimal facilities would be constructed and maintained." If the entire RA is not designated to existing roads unless open we recommend the North Lake County Special Recreation Management Area be so designated to minimize impacts to wildlife and wildlife habitat.

FIRE MANAGEMENT

257-76

Pg. 2-75 A section discussing the types and preferred uses of mechanical treatments needs to be added. The descriptions of the alternatives talk about mechanical hazardous fuels reduction not just wildfire or prescribed fire treatments. We would prefer mechanical treatments be utilized in certain wildlife habitats such as bighorn sheep, concentration of greater sage-grouse leks and mule deer winter range.

257-77

Pg. 2-77 ~~Although ersted wheatgrass plantings may eventually allow some native plants to recover over time, large expanses of ersted wheatgrass have the potential to burn more frequently than native plant communities.~~ We disagree with this statement.

257-78

Pg. 2-77 Medusahead: It is important to identify Medusahead as an especially invasive annual grass and to have a much broader and complete discussion on the potential impacts to rangeland invasion and management activities. The potential for the spread of Medusahead needs to be addressed in the fire plan.

257-79

Pg. 2-77 Cheatgrass: It is very important to have a much broader and complete discussion on the hazards of cheatgrass. Whether this is done in the noxious weed section 2-14 or the shrub/steppe section 2-2 doesn't really matter. The importance of this discussion is to clearly articulate the significance of cheatgrass in the environment (i.e., prescribed fire treatments should not be proposed where cheatgrass exists (invading juniper stands, or deteriorated sage lands). As well as articulating the management limitations cheatgrass imposes (i.e., fire suppression or mechanically breaking up fuel continuity should focus on big sage areas with a cheatgrass understory). The ICBEMP states "The 'cheatgrass-wildfire cycle' presents the greatest risk to the Wyoming big sagebrush portion of the big sagebrush cover type and to the more moist salt desert shrub plant communities within the salt desert shrub cover type" (ICBEMP Draft EIS 2-109).

257-72: This is defined in the Cultural and Paleontological Resources, Traditional Cultural Property section of Chapter 2. The definition has also been

added to the Glossary. The specific changes in management due to this designation may vary depending on the specific resource(s) being protected. This could include a plant collecting area, a religious area, or other type of activity area. Designation does not preclude other uses. However, the BLM needs to determine if other uses are compatible.

257-73: As a result of consultation with the Lake County Agricultural Extension Agent, changes to the discussion of feedlots have been made in the text.

257-74: The text has been corrected for consistency.

257-75: Under the preferred alternative (Alternative D), OHV use would be restricted to existing roads and trails in most of the North Lake Special Recreation Management Area (see Map R-7). However, the proposed plan also includes various OHV designations for the ACEC's within the special recreation management area, including open, limited to existing roads and trails, limited to designated roads and trails, and closed. See also comment response 257-7.

257-76: Fuel treatments may also be implemented through mechanical, chemical, or biological treatment of vegetation. These operations are carefully planned by an interdisciplinary team of resource specialists to ensure all possible environmental effects are considered in project planning and implementation. Types of mechanical treatments that may be considered include chainsawing, shearing, chipping, and mowing in woodland/timber vegetation, or plowing, beating, mowing, etc., in shrublands. New mechanical technology would be considered as it becomes available. Chemical treatment may be considered in the future. Currently, the BLM in Oregon is enjoined from using chemical herbicides (except four herbicides) by Federal Court Order #83-6272-E, dated January 6, 1984, and modified by Court Order #844-F2D588 in 1988. Integrated fuel treatment methods involving fire, mechanical, chemical, and biological treatment may be considered for use in certain environmental situations.

257-77: This statement was corrected to reflect your concerns.

257-78: Medusahead was included with the description of cheatgrass; the text has been modified appropriately.

257-79: Cheatgrass communities in the LRA total about 78,620 acres and threaten other habitats nearby. One aspect of cheatgrass that has not been analyzed to date in the LRA is the interaction between microbial crust and cheatgrass; studies elsewhere are demonstrating a correlation that remains to be analyzed in the Northern Great Basin. ICBEMP concluded that, "Sites that have become dominated by annual species such as cheatgrass or medusahead wildrye have lowered potential for biological crust development due to high plant density, little accumulation, and frequent fire." See amended text.

Page 2-107 in the ICBEMP DEIS lists the rangeland cover types most susceptible to cheatgrass invasion, and 2-109/110 discusses the potential impact of rangelands to cheatgrass invasion. This information should be included in the LRMP.

257-80

Pg. 2-78 Fire Ecology of the Major Vegetation Types: Bitterbrush and mountain mahogany vegetation types need to be identified and potential impacts discussed. We have concerns with how fire would be applied to the bitterbrush and mountain mahogany stands because they are crucial components of mule deer winter range. A discussion on the use of mechanical treatments needs to be added.

257-81

Pg. 2-78 Fire Ecology of the Major Vegetation Types: A more complete discussion of potential impacts to black, silver and low sage communities is needed. These communities provide essential habitat for many wildlife species. We can not support the use of prescribe fire in these communities. A discussion on the use of mechanical treatments needs to be added.

257-82

Pg. 2-78 Fire Ecology of the Major Vegetation Types: The riparian vegetation type needs to be identified and potential impacts discussed. We have concerns with how fire would be applied to riparian habitats.

257-83

Pg. 2-78 "Sagebrush fire return intervals are difficult to determine since fire histories cannot be accurately studied." A more completed discussion on proposed prescribe fire return intervals within the various vegetation types is needed somewhere in LRMP

257-84

Pg. 3-29 Management Goal 3: Goal 3 is not consistent with the rest of the plan. Rehabilitation should be included in the goal "Restore, rehabilitate and maintain (see A-281 definitions)." ...and historic fire regimes should be changed to natural processes, since there are many natural processes the fire staff should consider in addition to the historic fire regime. While "...through wildland fire use and prescribed fire" should be changed to *through fuel reduction methods*. The descriptions below each of the alternatives talks about using "...mechanical hazardous fuels reduction..." not just wildfire or prescribed fire treatments.

257-85

Pg. 3-108 Management Common to All Alternatives –see page 2-77-78 comments. The LRMP will be completed prior to the new fire plan. How will BLM implement this new strategy? Will it become a part of the LRMP once it is completed? All other resources need to make sure their alternatives address and are in compliance with the fire plan once it is completed.

257-86

Pg. 3-108 modify Alternative C: Add the following text – "Provide for an appropriate management response *to protect natural values* utilizing the full range..." Without the added words (which is consistent with 3-28) this alternative description won't have a theme.

Pg. 3-108 modify Alternative C "If the fire is achieving resource benefits, such as fuel reduction, restoring natural process to rangelands *or restoring wildlife habitat*, the fire would be managed using a confinement strategy, allowing the fire to burn up to defensible natural or human-created barriers." With this statement in the plan do we still need fire management plans for specific areas, page 3-29 management goal 3 #1?

257-80: Bitterbrush and mountain mahogany are small, but critical elements within the three major vegetation types discussed in the Fire Ecology section of Chapter 2. It is recognized that they are sensitive to fire. Treatments are carefully planned by an interdisciplinary team of resource specialists to ensure all possible effects (bitterbrush/mountain mahogany) are considered in project planning and implementation. Mechanical methods have been added to the list of appropriate treatment methods. See also comment response 257-76. Every effort will be made to appropriately plan vegetation treatments so that wildlife objectives for bitterbrush and mountain mahogany are clearly stated in burn plans and are met on the ground.

257-81: Please see response to comment 257-3 and 257-76.

257-82: Riparian areas are small, but critical elements within the three major vegetation types discussed in the Fire Ecology section of Chapter 2. It is recognized that they are important to wildlife. Treatments are carefully planned by an interdisciplinary team of resource specialists to ensure all possible effects (riparian wildlife values) are considered in project planning and implementation. Every effort will be made to appropriately plan vegetation treatments so that wildlife objectives for riparian areas are clearly stated in burn plans and are met on the ground.

257-83: Sagebrush fire return intervals are very difficult to quantify. General fire return intervals were added to the Fire Management section of Chapter 2.

257-84: The word *rehabilitation* refers to repairing wildland fire damage and is not consistent with Management Goal 3; it is addressed in Management Goal 2.

Goal 3 addresses wildland fire use and prescribed fire to restore and maintain vegetation ecosystems. These are the natural processes involved in the historic fire regime. Wildland fire and prescribed fire are the tools that fire management has control over. While other fuel treatment methods affect historic fire regimes, it does not directly involve the use of fire to achieve the fire regime restoration objective.

257-87

Pg. 3-109 Management Goal 2, Rationale – “The BLM’s Emergency Fire Rehabilitation Handbook’ (H-1742-1)…” – does the handbook instruct BLM to use the best and latest science available to manage ecological types invaded by cheatgrass or other noxious invasive weeds?

257-88

Pg. 3-109 4th bullet, somewhere in the plan there should be a strong emphasis to control invasive and noxious weeds before they reach a stage where fire rehabilitation is necessary.

257-89

Pg. 3-109, Management Goal 3: Rewrite as recommended in comment page 3-29 above.

Pg. 3-110, Alternative C: “Emphasis would be placed on using prescribed fire for restoration of degraded shrublands and rangelands.” See comment 2-77-78 above.

Pg. 3-111, Alternative D: “The Fort Rock Fire Management Area would no longer be managed for appropriate suppression response, but would be managed for wildland fire use.” We support this change in management and recommend additional areas be identified for wildland fire use.

257-90

Pg. 3-110/111, Alternatives B, C, D: Treating up to 10%, 40%, and 35% (320,000, 1,280,000, & 1,120,000 acres respectively) of the resource area in the next 10 years seems unrealistic. To achieve this level of treatment a tremendous amount of money and staff would need to be dedicated to adequately identify invasive and noxious weed sites; sensitive, threatened and endangered animal and plant habitats and sites; along with existing and desired vegetative condition classes, existing and desired land uses, etc. A daunting task anyway one looks at the proposed scenario. As written, this scenario gives BLM maximum flexibility which in turn requires a rigorous and well funded monitoring plan if the BLM expects to see plan actualization

257-91

Pg. A281 Fire rehab plan (Appendix L) is in conflict with alternative C to rest re-seeded areas from livestock grazing for a minimum of two full years following rehabilitation.

257-92

Pg. A281 “Areas where shrubs are a crucial wildlife habitat component for greater sage grouse, bighorn sheep, mule deer and/or pronghorn. Map V-1 delineates these areas.” Map V-1 identifies general vegetation class and does not identify the crucial wildlife habitat. Should this be referencing Maps W-1 and W-2?

257-93

Pg. A282 Seed mixtures have been formulated that are designed for specific soil types (see Appendix G). This should say see Table L2-1.

RECREATION RESOURCES

257-94

Pg. 2-79 include hunting small game such as rabbits.

257-95

Pg. 2-82 What is a recreation opportunity spectrum? How will management and/or use be effected by the designation?

257-96

Pg. 3-114 modify Alternative C “No wilderness therapy school would be allowed to operate within mule deer winter range between Dec. 1st and March 31st or within bighorn sheep habitat.”

257-85: As stated, there is a fire management plan now in place that reflects guidance of the current “High Desert and Warner Lakes Management Framework Plans,” as amended, as well as the plan for the Fort Rock area (USDI-BLM 1982a, 1983a, 1983b, 1983c, 1989b, 1989c, 1996c, 1996d, and 1998e). The Proposed RMP/Final EIS contains fire management direction. The new fire management plan (to be completed by 2004) would be tiered to the general RMP fire management direction, so that future management actions would be in compliance with BLM policy. The revised fire management plan would be developed with a team of interdisciplinary resource specialists.

257-86: Additional wording is not required. The theme for Alternative C is resource restoration and protection and flows throughout the document. Refer to Management Themes of the Alternatives section of Chapter 3. The rest of the detailed alternative description throughout Chapter 3 reflects this theme.

Restoring natural processes to rangelands is synonymous with restoring wildlife habitat. Fire management plans are considered “activity plans” that are intended to step-down the management direction from broader land use plans into more specific direction. BLM policy requires fire management plans be revised after a new RMP is completed. Also see response to comment 257-85.

257-87: Appendix L2, Fire Rehabilitation, was amended appropriately to include all ecological types.

257-88: Please see comment responses 228-18 (paragraph 1) and 243-8.

257-89: Please see response for comment 257-84.

Any treatments would be carefully planned by an interdisciplinary team of resource specialists to ensure that possible environmental effects are considered in project planning and implementation.

The revised fire management plan (to be completed in 2004) would consider areas that are appropriate for prescribed and wildland fire use.

257-90: Treating up to 10 percent (320,000 acres), 50 percent (1,600,000 acres), and 35 percent (1,120,000 acres) of the resource area in the next 10 years are broad proposed figures for NEPA analyses of the alternatives. Refer to the

OFF-HIGHWAY VEHICLES

Pg. 3-32 OHV activities and management efforts to control them has become a huge issue for public land managers throughout the west. Looking at the alternatives, alternative C is the only one that appears to realistically address this daunting issue for land managers. Given the emphasis of BLM's Environmental Impact Statement - of managing for activities compatible with the ecosystem - the high number of open acres to OHV use seems to be in conflict with the rest of the plan. Considering the sensitive nature of the rangelands, invasive and noxious weed concerns, along with wildlife issues, the alternatives that propose leaving 2 million plus acres open to OHV use seems to be in direct conflict with planning efforts to restore, rehabilitate, protect, and/or enhance resource values across the landscape. Therefore, we recommend designating OHV use to existing roads throughout the RA. Areas open to overland travel should be specifically designated.

257-97

Pg. 3-117 Monitoring: "Baseline data would be established and sites rehabilitated or closed as necessary." It is important to clearly define what constitutes resource impacts, to conduct an adequate baseline inventory, to determine thresholds from the baseline that will trigger management actions, and to adequately monitor OHV activities if the BLM hopes to meet the ecosystem management intent of their plan.

ENERGY AND MINERAL RESOURCES PGS. 3-122-3-128

257-98

Pg. 122-128 Alternative D recommendations for mineral leasable, salable materials and locatable minerals appear to be in conflict with the greater sage grouse and sagebrush-steppe ecosystem management guidelines. The guidelines state: "Energy and Mineral (leasable, salable, and locatable (where a plan of operation is required)): Avoid surface occupancy with 1 km (0.6mi) of known/occupied sage grouse habitat." Therefore, we recommend Alternative C, which follows the guidelines.

257-99

Pg. 3-124-125 Locatable Mineral Alternative C follows the greater sage grouse guidelines however alternative D limits to breeding habitat only. Alternatives A, C, D Other restrictions/stipulations apply primarily to areas of big game ~~and~~ winter range ~~and raptor nesting habitat~~. What are the restrictions/stipulations?

Pg. 3-126 Mineral Leasing Alternative C follows the greater sage grouse guidelines however alternative D limits to breeding habitat only. Alternatives A, C & D Other restrictions/stipulations apply primarily to areas of big game ~~and~~ winter range ~~and raptor nesting habitat~~. What are the restrictions/stipulations?

Pg. 3-127-128 Salable materials Alternative C follows the greater sage grouse guidelines however alternative D limits to breeding habitat only. Alternatives A, C & D Other restrictions/stipulations apply primarily to areas of big game ~~and~~ winter range ~~and raptor nesting habitat~~. What are the restrictions/stipulations?

LANDS AND REALTY

Management Goal 3, Management Common to All Alternatives. The acres listed in the alternatives are upper limits for analytical purposes rather than firm targets. Treatment acres refer to the total area included in a project environmental analysis. Treatments are typically designed to produce a mosaic landscape pattern; they do not assume that every acre in an analysis area is actually treated (burned, mowed, sheared, etc).

The fuels management program is large, and budgets for the program have increased several hundred percent in the last few years. Interdisciplinary team pretreatment review, planning, implementation and monitoring have increased proportionately. Monitoring is described further in Appendix R.

257-91: Appendix L provides more detail for fire rehabilitation under the preferred Alternative D. Both natural revegetation and seeding with rangeland drills or aerial seeding require a minimum of two growing seasons of rest. Under Alternative C (as described in Chapter 3), seeded areas would be rested for at least 2 full years, which could be the same or longer than two growing seasons, depending on what time of year the seeding is actually done.

257-92: These changes have been incorporated into the Proposed RMP/Final EIS.

257-93: The text in Appendix L1 has been changed appropriately.

257-94: Small game (such as rabbits) hunting has been included as an activity which occurs throughout the resource area.

257-95: Recreation opportunity spectrum is defined in Appendix M2.

257-96: Under Alternative C, no wilderness therapy school would be allowed to operate within the North Lake Special Recreation Management Area between December 1 and March 31 annually. The North Lake Special Recreation Management Area encompasses all of the known mule deer winter range and bighorn sheep habitat in north Lake County.

257-97: Resource impacts associated with OHV use is generally associated with soil compaction, soil erosion, and destruction of vegetation. Baseline inventories would be obtained through field observations, photo documentation, aerial photos, etc. Monitoring for potential impacts associated with OHV uses would be ongoing. Baseline inventories would be conducted on specific areas and on a case-by-case basis throughout the resource area.

Pg. 3-129 We do not support the Oregon Department of Parks and Recreation's request for 28,750 acres of public and Bankhead Jones Land northwest of Fort Rock adjacent to the Deschutes National Forest, because it will impact our ability to manage wildlife damage in the Fort Rock Valley.

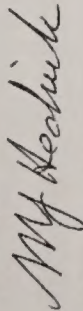
In general we oppose exchanges of isolated BLM parcels within big game winter range and/or greater sage-grouse habitat. Additionally we would oppose exchanges of isolated BLM parcels in the vicinity of the Summer Lake Wildlife Area.

Pg. 3-131 modify Alternative D All ACEC's, WSR's, Buck Creek viewing area and greater sage-grouse breeding habitat would be designated right-of-way avoidance zone.

Throughout these comments we have requested meeting(s) to discuss several issues and update information. Please contact us at your convenience so we can schedule meetings with appropriate staff.

If you have any questions or need additional information regarding any of our comments or concerns please feel free to contact me at (541) 943-3324

Sincerely,



Mary Jo Hedrick
Asst. District Wildlife Biologist

C Craig Foster
Steve George
Curtis Edwards
Todd Forbes
Vern Stofleth
Chip Dale

257-98: Please see response to comment 17-5. The Wildlife section of Appendix N3 in the Draft RMP/EIS contains protective stipulations that would be applied to greater sage-grouse habitat.

257-99: Please see response to comment 17-5. The Wildlife section of Appendix N3 in the Draft RMP/EIS contains protective stipulations specific to raptor habitat.

257-100: Most ACEC's, one WSR, and the Buck Creek area are included in the right-of-way avoidance zone under Alternative D (see Map L-8). However, Alternative D was specifically designed to include only greater sage-grouse breeding habitat in the avoidance zone. In contrast, Alternative C was specifically designed to include all greater sage-grouse habitat in this zone. Chapter 4 compares the impacts of the two alternative management strategies on greater sage-grouse and their habitat.

LAKEVIEW, B.L.M.

Dear Reader,

In reviewing the Draft Lakeview Resource Management Plan and Environmental Impact Statement, I am concerned about more and more land being placed in restrictive non-multiple use designations. While on first reading these ACEC's say that grazing will be allowed in the description of some of the grazing allotments, it is stated that the management under the preferred alternative D will actually be the management described under the more restrictive alternative C. Of particular interest to me as a user of the public lands is allotment #0517, Coyote Calvin (As a shareholder of Fitzgerald Ranch Inc.) and Allotment #0600 Beatys Butte. (As a member of Beatys Butte Grazing Association) The grazing on these two allotments is now and has, over the years, been adjusted and managed by extensive collaboration between the BLM and the Ranchers under the rest management practice concept to maintain and enhance the entire allotment. To over lay this with more restrictive and yet to be defined management parameters on portions of these allotments could alter the effective use of the total allotment.

Some comments on the process: 1. In most of the ACEC designations there is reference to ONHP special ecosystem cells. In the Hawksie Walksie designation particularly (pg. 2-53) I would like to note that directly to the south of the area is the Sheldon Game Range which is already managed in a more restrictive manner and could serve this purpose to the same or greater extent than the Hawksie Walksie ACEC. I would also submit that many of the ONHP cells would be as well represented in other parts of the Sheldon-Hart Mountain refuge system. This is especially true of the Abert Rim ACEC area, which is very similar to the East side of Hart Mountain as to altitude and slope. 2. Description of the current grazing management in the document. In the case of Coyote Calvin #0517 or Beaty Butte #0600, the description of the season of use is for the entire allotment generally, and does not refer to deferrals within the allotment. The use is stated as number of months but doesn't reflect the manner that these allotments are

258-1

258-1: ONHP cells are artificial constructs used by the Natural Heritage Program to inventory, classify, and evaluate natural areas in the state of Oregon. The Sheldon National Antelope Refuge falls in Nevada, outside the area addressed by the ONHP. Cells contain one or more ecosystem elements and are chosen for protection from extinction. Considerations used to assess this danger include: rarity of known, high-quality occurrences of the cell; threat to the occurrences of the cell type; and the adequacy and viability of protected occurrences of the cell (ONHP 1998).

258-2

258-2: Table 2-41 and Appendix E identify the general type of grazing system for each allotment. More specific information on grazing systems may be found in an allotment management plan or an allotment evaluation. These documents are available upon request.

currently used. The livestock are moved or rotated so that each area within the allotment receives rest during the growing season or if it is used during the growing season, it is deferred the next growing season. If this distinction had been made in the document it would have given the reader a more accurate view of the current management and a better basis for evaluation of the need for the proposed changes.

Abert Rim seems to be included because it is next to Abert ACEC and since it is already a WSA, the values cited are already protected and further protection should not be added at this time. If the WSA designation is abandoned in the future the area could be reevaluated on its merits at that time. Some of the suggestions noted as possible ACEC designations such as possible Juniper manipulation for Big Horn Sheep habitat, are in direct (as I understand the policy) conflict with the later recommendation for wilderness designation.

Hawksie Walksie is also an ACEC designation on top of a WSA and there are also contradictions such as the potential for gathering seed that are contrary to the later strong wilderness recommendation. I feel they are restrictive designation at a time there is sufficient protection for any area.

The Foley Lake ACEC is based primarily on the existence of one plant, the Columbia Cress, which is listed on the inventory of plants found in the Sheldon Refuge (therefore, is already in a protected area locally) and which is not listed on the list of documented sensitive plant species on page 2-17. There is also another one of the ONHA cell areas. I find it hard to believe that a lot of these so called "Cells" are not already protected in parts of South East Oregon or Northern Nevada. I also feel that these cells, as they are defined in the document, are very general in their make-up and while they might be areas of interest, they hardly deserve the designation of "Critical"

General comments on the possible effects of the proposed alternative on Lake County: most of the proposed ACEC's carry

258-3

258-3: Some forms of vegetation treatments are allowed in WSA's. For example, our efforts to control natural fires for the last few decades have left several WSA's with more western juniper than would have occurred under natural fire cycles. This pattern is detrimental for bighorn sheep habitat. Policy for this is described in Chapter 3 of the "Interim Management Policy and Guidelines for Lands Under Wilderness Review" (USDI-BLM 1995b). This allows use of prescribed fire and seeding of natural vegetation where it is necessary to maintain or restore natural systems.

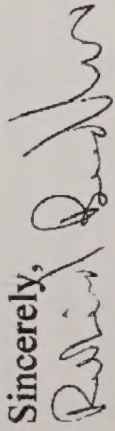
258-4

258-4: The Foley Lake ACEC is based on the ONHP "Basin and Range Ecosystem" plant cell that represents the black sagebrush and bunchgrass community complex. Columbia cress is also found there (see Table 2-33). Columbia Cress is not found on Sheldon Refuge, but there is a conservation strategy signed between the USFWS, BLM, and other Federal land agencies in California, Oregon, and Washington, that identifies management to protect the plant. The Foley Lake population is one of the few that has intense, long-term research to support its viability and the influences of grazing by both wildlife and livestock. This plant community cell may exist in other places in Oregon, but this is the area ONHP has identified as one of the best representations in the state.

258-5

with them either the possibility of more restrictions on grazing or restrictions on accessibility to the general public or both. Given the conclusion that Lake and Harney counties are areas of low social or economic resiliency (pg. 2-63) designation of large scale (which these are) restrictions of what has been a successful Multiple Use approach to the management of these lands will only serve to further weaken and undermine the efforts of this community to thrive and prosper. Efforts, that until now, have been marked by a great deal of cooperation between the Federal Agencies and the private sector will be ignored. An example of this is the Oregon Back Country Byways to enhance tourism and, as I mentioned earlier, the long term and on going effort of the Agencies and the Livestock Industry to enhance and improve an already successful grazing management program. Perhaps there is a need for protection of special areas but I submit that these need to be considered on a narrow case-by-case basis and not in a document that attempts to protect every thing possible in one process. I urge the adoption of alternative number one and a continuation of the current successful cooperative process of the management of our public lands.

Sincerely,


 Mary Bradbury
 Richard and Mary Bradbury

258-5: As specified by CFR 8340 and BLM planning guidance, the Draft RMP/EIS examined a full range of alternatives. The range includes various restrictions of recreation development, OHV's, grazing, mineral exploration and development, and other economic uses. In the Human Uses and Values section, the impacts to the local and regional economies are discussed for each alternative and are one of many things the BLM decision-maker must consider. Our analysis of the alternatives indicates that there would be no significant negative economic impact from these new designations, since most current uses, including livestock grazing, would continue. One area (Red Knoll ACEC) near Tucker Hill is proposed to be withdrawn from mineral entry, but that would not affect the ongoing perlite mining operation to the north.

RECEIVED

FEB - 4 2002

LAKEVIEW, B.L.M.

1-28-02

COMMENTS TO THE DRAFT LAKEVIEW RESOURCE MANAGEMENT PLAN/
EIS.

HELLO,

AFTER SPENDING NUMEROUS YEARS HUNTING, FISHING & RECREATING ON THE PUBLIC LANDS ADMINISTERED BY THE BLM. ENCOMPASSING THE VALE BURNS, PAINEVILLE AND LAKEVIEW DISTRICTS IN OREGON, THE WINNEMUKCA DISTRICT IN NEVADA AND THE SUSANVILLE IN CALIFORNIA. ONE THING HAS BECOME QUITE EVIDENT THAT THE BLM HAS WEIGHTED MOST OF ITS LAND MANAGEMENT PRACTICES TOWARD COMMODITY PRODUCTION. BECAUSE OF ITS ASSOCIATED IMPACTS THE HIGH DESERT ECOSYSTEM HAS SUFFERED SOME MAJOR DEGRADATION OVER THE YEARS. I HAVE OBSERVED NUMEROUS EXCLOSURE FENCES NOT MAINTAINED OR CUT. TURNED CREEKS, SPRINGS/SHEEPS, ASHEN STANDS, BITTERBUSH & TALL SAGEBRUSH COMMUNITIES OVER UTILIZED.

WHEN MANAGEMENT STRATEGIES PUT COMMODITY PRODUCTION AT A HIGHER PRIORITY THE DESERT ECOSYSTEM RESPONDS PHENOMENALLY. I HAVE WITNESSED THIS IN THE TRAUT CREEK & PUEBLO MTS., ACTY MOUNTAIN & HAWKS VALLEY, GRANITE & ACTY SPRING UNTIL THIS YEAR WERE RECOVERING NICELY. THE HIGH STOCKING LEVEL & LONG SEASON OF USE TOOK A TOBE ON THIS AREA. THE ENCLOSED PICTURE OF SHEEP SPRING (PICTURE #1) OBVIOUSLY SHOWS THE IMPACTS OF MANAGEMENT STRATEGIES FAVORING COMMODITY PRODUCTION. THIS WETLAND AREA REALLY GIVES TWO ORGANIZATIONS A BLANK EYE THE BLM & THE PERMITTEES, REPRESENTING THE CATTLE INDUSTRY, AND, THERE RATHER OF HAVING STRONG TIES TO THE LAND. THE EXCLOSURE IS NONEXISTENT & WITH NO ATTEMPTS TO REPAIR IT IN THE LAST TWO YEARS. I THOUGHT GRAZING FEES ARE ARTIFICIALLY LOW TO COMPENSATE PERMITTEES FOR THE COST OF MAINTAINING SPRING & OTHER EXCLOSURE FENCE. ITS APPARENT SOMEBODY IS GETTING A FREE RIDE HERE.

2592

(2)

SOUTH CORRAL SPRING HAS BEEN IMPAIRED IN ORDER TO SUPPORT COMMODITY PRODUCTION. THE WORK DONE THERE SHOWS NO REGARD FOR THE IMPORTANCE OF THE RIPARIAN AREA SURROUNDING THE SPRING. IT CERTAINLY REFLECTS POORLY ON THE LAND OWNER & SHOWS A TOTAL DISREGARD FOR THE LAND.

IT IS FRUSTRATING TO TRAVEL THE DISTRICT AND FIND FEW IF ANY DISPERSED CAMP SITES, HUNTING AREAS OR FIGHTING SITES NOT IMPAIRED BY CATTLE.

LISTED ARE AREAS THAT REFLECT OVER USE IN SUPPORT OF COMMODITY PRODUCTION

① COLEMAN RIM

TIM, HIDDEN, ROSE BURNER, BURRO & JENNY SPRINGS. MEADOWS THAT HAVE DEEP CUT RUN-OFF COURSES. THAT EFFECT WET MEADOW HABITAT.

LITTLE JUNIPER MTN.

② BARREY SPRING

③ SPALDING RESERVOIR

POORLY MAINTAINED OR NON EXISTENT EXCLOSURE FENCING.

④ HAWKS VALLEY

ALTY, SHEEP, SCOTTS CALINE, JUNIPER & GRANITE SPRINGS

⑤ SAGEEN BUTTE

SNAKE EYES SPRING EXCLOSURE IN DISREPAIR

⑥ COYOTE HILLS

CEMENT SPRINGS AREA.

⑦ JUNIPER MTN

RADIO RESERVOIR'S EITHER HAD NO EXCLOSURE FENCE OR IT WAS IN DISREPAIR. (THIS OBSERVATION WAS MADE A FEW YEARS AGO)

gml

(3)

I DID OBSERVE AN AREA ON TOP OF ADENT RIM FROM THE FOREST BOUNDARY NORTH TOWARD THE COLUIN TIMBER, O'HALIHAN SPRING AREA. SHOWED HOW THE DESERT RESPONDS WITH NO CATTLE IMPACTS. AND VISIT OCCURED IN LATE JUNE. THE SAD PART WAS THAT THE PROBLEM HAD BEEN DISPLAYED TO THE COLUIN TIMBER & SURROUNDING AREA.

I FIND ALTERNATIVE D + ITS REFERENCES TO A SHOW PAVED MANAGEMENT PRACTICES TOWARD RESTORATION & PROTECTION DISTURBING

STATEMENTS SUCH AS THE FOLLOWING CERTAINLY LOOK POORLY ON THE BLM. FROM TABLE S-1

SHRUB STEPPE VEGETATION IMPACTS WOULD BE SIMILAR TO ALTERNATIVE C, BUT WITH GREATER IMPACTS

FROM LIVESTOCK GRAZING. RIBARAND WETLAND VEGETATION RESTORING NONFUNCTIONING SITES BUT AT A SLOWER RATE WILDLIFE & WILDLIFE HABITAT IMPACTS. WOULD BE SIMILAR TO ALTERNATIVE C, BUT WOULD OCCUR LESS QUICKLY

RESULTS WOULD BE ACHIEVED AT A SLOWER RATE. SPECIAL STATUS ANIMAL SPECIES. IMPROVEMENT & RECOVERY RATES WOULD BE SOME WHAT SLOWER.

THE IMPACTS TO THE WILDLIFE PLANT COMMUNITIES

& WATER. HAVE BEEN IMPACTED FAR TO LONG

FOR THE BENEFIT OF ONE USER. ITS TIME

THE CATTLE INDUSTRY MAKES SOME SACRIFICE,

TO THE NEED FOR RESTORATION & PROTECTION

STOCKING LEVELS & PERIOD OF USE NEED CHANGED.

AS A HUNTER I WOULD LIKE TO ENJOY A HUNTING TRIP WITHOUT COWS IN A CAMPING SPOT, IN THE HUNTING AREA & NEAR WATER SOURCES.

2592

ON BLM ADMINISTERED LANDS

I WOULD SUGGEST ALL CATTLE BE REMOVED FROM THE MIDDLE OF AUGUST THRU THE SECOND ELK RIFLE SEASON. AFTER ALL WE AS HUNTERS ARE ANOTHER LARGE USER GROUP ON PUBLIC LANDS WITH FEE HUNTING BECOMING THE NORM ON DEERED GROUND. ITS TIME THE BLM MANAGE THE PUBLIC LANDS TO PROVIDE THE BEST WILDLIFE HABITAT AT THE FASTEST PACE POSSIBLE. PRIVATE LAND OWNERS ARE COMPLAINING ABOUT WILDLIFE IMPACTS TO THEIR LANDS. COULD IT BE THAT THEIR LANDS ARE IN BETTER CONDITION THAN PUBLIC LAND. LETS MOVE GRAZING IMPACTS TO THEIR LANDS + WILD LIFE IMPACTS BACK TO THE PUBLIC LANDS.

RECOMMENDATIONS FOR WILD + SCENIC RIVERS SHOULD BE INCREASED + NOT LIMIT THE RECOMMENDATION TO ONE STREAM. IF BY CHANCE ONLY ONE STREAM WAS RECOMMENDED BECAUSE OF THE ASSOCIATED IMPACTS TO COMMODITY PRODUCERS THAT A DESIGNATION WOULD BRING, HAS SWAYED THE DECISION PROCESS, THAN SOMETHING IS WRONG.

I WOULD LIKE TO SEE WELLS DRILLED TO REPLACE SPRING DEVELOPMENTS. ALLOWING THE SPRING WATER TO RETURN TO ITS NATURAL RIPARIAN CHANNEL THUS PROVIDING THE BEST POSSIBLE WILDLIFE HABITAT. ALONG WITH THIS INCREASED EXCLOSER FENCING. INCREASE COSTS OF THIS CAN BE JUSTIFIED TO THE PRODUCER BECAUSE OF THE ARTIFICIALLY LOW ANNUAL RATE CHARGED ON PUBLIC LANDS.

AT HANKS VALLEY ACTY & GRANITE SPRINGS WOULD

END

BENEFIT. IF SOME GROUP SAYS WILDLIFE NEEDS
ARE BETTER SERVED BY HEAVING THE WATER
ON TO ALUMINUM TANKS AFTER CATTLE ARE
REMOVED FROM AN ALLIEMENT, ^{THE GROUP SHOULD BE INFORMED} THAT WILDLIFE WOULD BENEFIT
MORE BY THE WATER BEING RETURNED TO THE NATURAL
RIPARIAN CHANNEL. WATER WELLS IN THE
CRESTED WHEAT SEEDING ALONG US 395 +
ALKALI REST STOP MEET THE NEEDS THERE
SO WELLS SHOULD WORK AT NUMEROUS OTHER
LOCATIONS

WELL DRILLING SHOULD BE DONE BECAUSE
OF YOUR OWN STATEMENT ON WET LAND / RIPARIAN
AREAS.

TABLE 2-1 EXTREMELY VALUABLE

PAGE 2-8 RIPARIAN VEGETATION COMMUNITIES

ARE MORE DIVERSE THAN THE SURROUNDING
UPLAND AREAS + THIS SUPPORT A WIDER VARIETY
OF WILDLIFE SPECIES.

YOUR RELUCTANCE TO REDUCE AUMS WILL
CERTAINLY REDUCE YOUR FLEXIBILITY TO
IMPROVE + RESTORE WETLAND / RIPARIAN + UPLAND HABITATS
AT THESE LEVELS IMPROVEMENT IN ONE AREA
WILL COME BY SACRIFICING ANOTHER. AT THE
PROPOSED LEVELS IDENTIFIED THE DISTURBANCE
ASSOCIATED WITH RELATIVELY HIGH CARRYING CAPACITIES
AND LONG SEASONS OF USE FOR LIVESTOCK WILL
CONTINUE THE DEGRADATION OF HABITATS THAT
ARE SO PROFOUNDLY EVIDENT TODAY. ONCE AGAIN
ONE USER OF THE PUBLIC LAND IS SPOILING THE

209e

NATURAL BEAUTY OF THE HIGH DESERT ECOSYSTEM.
THIS TRULY HAS A PROFOUND EFFECT ON OTHER
USERS BOTH WILD LIFE & HUMANS.

STUDIES HAVE SHOWN PER PAGE 2-32 AND 2-36
HARRISVIEW RMP/IS. THAT ANTELOPE HAVE DECLINED
20-30% SAGEGROUSE ARE DECLINING. DEER POPULATION
ARE NOT EVEN ADDRESSED AND THERE NUMBERS
MAY NOT BE DOING WELL. NON GAME SPECIES
MAY ALSO BE IN DECLINE.

IT IS TIME THAT RESTORATION & PROTECTION OF
THE RESOURCE MOVE TO THE FORE FRONT OF
LAND MGMT DECISIONS AND MOVE AT A FASTER
PACE THAN PROPOSED.

BEATY BUTTE AREA IS SUFFERING
TERRIBLY. AN OUT OF CONTROL REDUCED
FIRE & WILD FIRES & TO MANY ^{WILD} HORSES
ARE IMPACTING THE AREA.
WILD HORSE NUMBERS NEED REDUCED
& FAST PACED HABITAT MGMT PLAN
NEEDS IMPLEMENTED.

THANK YOU.

T.E. Downs
35725 N HARDLEY LN.
BURTON OR 97720

DEPT



SEEP SPRING

PHOTO TAKEN IN 1999

SUMMER OF 2000 THE ENCLOSURE WAS TOTALLY DESTROYED THERE WAS NO WATER IN THE POND IN THE FOR GROUND. THE AREA AT THE SPRING BOX LOOKED LIKE AN OPEN SEEP TANK. HOPE FULLY UNDER NEW MGMT STRATEGIES SPRINGS WILL PROVIDE WILDLIFE HABITAT FIRST & CATTLE NEEDS LAST.

25A9

Dwayne Sykes-RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview, OR 97630
January 31, 2002

RECEIVED
FEB - 4 2002
LAKEVIEW, B.L.M.

Subject: Lakeview Resource Management Plan

Dear Mr. Sykes,

I would like to see a strengthened variation of Alternative C become the plan of choice for the Lakeview area. In particular I strongly advocate the elimination of any livestock grazing on any of our public lands. In my view livestock grazing on public lands has done irreparable damage over the last two centuries to lands that we all own, particularly lands that are semiarid and very slow to recover as is the Lakeview area.

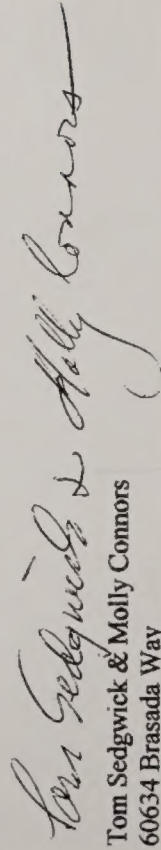
Secondly I would strongly advocate limiting ORV use to small areas since they do nothing to enhance the natural values of the environment and in fact are destructive of plants, detrimental to wildlife and scar the landscape. In particular keep the ORVs out of the Sand Dunes Wilderness Study and Lost Forest Area of Critical Environmental Concern.

Please do all you can do to enhance the natural values of the environment. Protect the riparian areas since they are so sensitive and important to the overall well being of semi arid regions.

Lets add to the Wild and Scenic River System such streams as Honey, Twelvemile, and Guano Creek. That would be a fitting legacy to our stewardship of the water resources of the Lakeview area.

Please value and hold high the environmental value and potential of this region.

Sincerely yours,



Tom Sedgwick & Molly Connors
60634 Brasada Way
Bend, OR 97702

LAKEVIEW, B.L.M.

FEB - 4 2002

JANUARY 30, 2002

DWAYNE SYKES - RMP TEAM LEADER
BUREAU OF LAND MANAGEMENT

DEAR MR SYKES,

MY FIRST THOUGHT ON SEEING THIS MONUMENTAL
WORK (THE RMP/ETS) WAS HOW MUCH DID IT COST THE
TAXPAYERS? I REALIZE THAT WE NEED TO CARE
FOR OUR PUBLIC LANDS BUT THIS REPORT SEEMS TO
BE AN OVERKILL.

MY WIFE AND I HAVE BEEN VISITING THE SHALDWIN
ANTelope REFUGE AND THE HART MT. REFUGE FOR SEVERAL
YEARS AND WE ENJOY THE TIME THERE. WE ARE
OPPOSED TO ANY MEASURES THAT WILL FURTHER RESTRICT
ACCESS TO THESE PUBLIC LANDS.

I THINK THAT SOME OF THE MONEY FROM YOUR
BUDGET SHOULD GO TOWARD IMPROVING SOME OF THE
ROADS ADJACENT TO THE SUNSTONE AREA.
THANKS FOR YOUR CONSIDERATION.

Sincerely

Troy Smith

14285 SW CANTREY BLVD
BEND, OR 97008

261-1

261-1: By the time the Lakeview RMP is completed, the total cost is expected to be approximately \$1,000,000 and will include data gathering, analysis, staff salaries, and document printing and mailing costs. This estimated cost is consistent with costs associated with other land use planning efforts in the BLM across the nation.

RECEIVED
FFR - 4 2002
LAKEVIEW, B.L.M.

C.D.Sykes
RMP Team Leader
BLM
1301 South G.Street
Lakeview,Oregon 97630

Dear Mr. Sykes:

I received the reports requested regarding the proposed Recreational, Wild and Scenic River designation of Twelve Mile Creek on Saturday, January 26, 2002.

On August 9, 1999, while meeting with Scott Florence, Allen Munhall, and Matt Webb on an unrelated matter, my wife Lavette and I expressed our objection to the above designation because we felt that it would put more pressure on us from the general public to cross our private land between Lake County Road 314 and the public land that you propose to place into this new designation.

Within your report regarding Twelve Mile Creek, on page A267, b-4, you state that access is limited to three steep jeep trails. Within this same paragraph, you state: "There is a county maintained road which crosses the stream near the Oregon/California State Line."

What you fail to state is the fact that we own private land between this county road and the targeted public land for a distance of approximately three-eighths of a mile.

We have no intention of granting the public the right to cross our private land for the purpose of ingress and egress to the public land involved.

I want your report to be re-written or amended to reflect this private land ownership.

Sincerely,
Buddy Laxague
Buddy Laxague
Box 277
Fort Bidwell, CA 96112
1/29/02

262-1

262-1: We have deleted the reference to the county-maintained road near the Oregon/California state line. We have also changed the boundary of the proposed stream corridor adjacent to your private lands. The designated stream corridor would begin adjacent to the eastern edge of your private land. Please refer to Map SMA-22.

RECEIVED

500 - 5 2002

LAKEVIEW, B.L.M.

Myron L. Steward
P.O. Box 61
Adel, Oregon 97620

January 31, 2002

Dwayne Sykes
HC 10 Box 337
Lakeview, Oregon 97630

Dear Dwayne;

As a member of the Beaty Butte Grazing Association, I am writing this letter to represent Steward Ranches, of which my wife and I are the sole owners. I am opposed to the proposed ACEC/RNA Hawk Mountain I, Hawk Mountain II, and Hawksie-Walksie lowland area as well as the Guano Creek/Sink Lakes ACEC/RNA and the High Lakes potential ACEC.

263-1

I would like to remind you that under our signed agreement on the Guano Creek -Shirk Ranch exchange that cattle are only excluded from Guano Creek area as long as the Shirk Ranch can provide 1500 AUM's of forage. If this goal is not met than Guano Creek is to be returned to the Beaty Butte allotment.

As roads are necessary to the efficient administration of range (including cleaning water holes and scattering bulls and salt), I am not in favor of road closures. The general public also needs access to their public lands, for their recreation and enjoyment.

I am in favor of developing and maintaining water sources wherever their potential exists. Water is the lifeblood of the desert--not only for livestock, but also wildlife and forage. According to Les Booth, BLM Range Conservationist, we are only using 30% of the available forage. And, the majority of use is within a half of a mile of water. The more watering locations available, the more forage available to both livestock and wildlife with less pressure on the range resource.

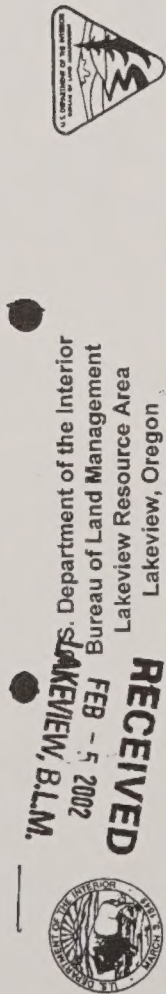
If studies need to be conducted where livestock are excluded, they can be done on the adjoining wildlife refuges.

Sincerely,

Myron L. Steward

Myron L. Steward

263-1: The agreement between the Beaty Butte Grazing Association, the BLM, and the USFWS stated that the BLM would allow up to 1,500 AUM's of use on the Shirk Ranch. If, for some reason, the agreement was canceled by the BLM, then the Beaty Butte Grazing Association would be permitted to graze in the portion of northern Jack Creek pasture that was not transferred to the Hart Mountain National Antelope Refuge.



Public Meeting for Lakeview Draft RMP/EIS

LEAVE COMMENTS AT REGISTRATION TABLE OR FOLD, STAPLE, AND MAIL.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Lakeview BLM Office, 1300 South G Street, Lakeview, Oregon during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: Matin & Kenny Cade
Address: PO Box 26 Ford Road Zip Code: 97735
Comments: We are concerned about the elk
allotment at 4 A.M. & the closure of the
roads leading to the Devil's Garden Lava
beds. Our ranch is located on the south
& west borders of the lava beds so both of
these issues will directly affect us. How will
the closure of the roads affect our own private
property and who will police the area to
make sure people stay off the roads? Right now
people trespass on our land to get to the lava
beds, leave gates open, throw their trash &
drive anywhere they please. If you put gates
with locks they will cut fences, shoot up signs
and drive on anyway.

As to the elk allotment - this affects how many
people in our area? Is this an acceptable amount?
Signature: Matin Cade Date: 2-2-02
The elk grazes on our alfalfa fields & hay barns - not
the sagebrush.

264-1

264-1: Road closure within the Devils Garden ACEC/WSA should not have any negative impacts on access to adjoining private land. Private landowners still retain the right to access their lands. Increased surveillance would be necessary to enforce such closures. Enforcement would be shared by the BLM and ODFW. Road closures proposed in the Devils Garden area have been reevaluated since the Draft RMP/EIS was released. Refer to Maps SMA-5 and SMA-24 and Table 4-4.

264-2

264-2: Please see response to comment 49-8.

Western Watersheds Project, Inc.

P.O. Box 280
Mendon, Utah 84325
435-753-2701 • utah@westernwatersheds.org

RECEIVED
FEB - 6 2002
LAKEVIEW, B.L.M.

January 31, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

Re: Lakeview RMP/EIS

Dear Mr. Sykes:

Western Watersheds Project, Inc. is submitting these comments on the Lakeview RMP/EIS because of our concern over the degraded condition of the watersheds and resources of the Lakeview Resource Area. Our major concern is livestock grazing and the demonstrated inability of BLM to properly manage this extractive use in accordance with the law. We hereby incorporate and support the comments submitted on this RMP/EIS from the Juniper Group Sierra Club. Our supplemental comments follow.

265-1

BLM has failed to establish the suitability of livestock grazing on these lands through any proper analysis of watershed, ecological or economic factors as required by FLPMA and NEPA. The failure to address the susceptibility of these lands to grazing impacts based on available forage, stocking rate, proper allocations to wildlife and watershed protection violates not only the law, but range ecology principles. You have failed to address sensitive soils as defined by NRCS, i.e. those that are highly erodible by wind and water. The grazing of livestock on these soils as well as steep slopes, saline areas, riparian areas and wetlands increases erosion, degrades water quality and alters groundwater recharge and stream flow timing and duration.

BLM generally fails to address livestock as a surface-disturbing activity with its concomitant impacts to archeological and cultural resources and the watershed and ecological functions that are so necessary to the sustained health of these lands. The admitted degradation and lack of data analysis coupled with promises to monitor in the future are empty. The public can have no confidence that you are proposing anything more than perpetuation of the status quo of continued degradation and economic loss to the taxpayer. Certainly we have no confidence that BLM will address livestock in any meaningful way under the preferred alternative. Merely citing Rangeland

265-1: Please see response to comment 228-4.

USDA-Natural Resource Conservation Service soil map unit descriptions discuss soil erosion characteristics. These map unit descriptions can be found in the soil survey manuscripts (USDA-NRCS 2000, unpublished), on the web site <http://www.or.nrcs.usda.gov/soil/index.atm>, or at county USDA Natural Resource Conservation Service offices. A summary description of the major soil mapping units of southern Lake and western Harney Counties has been added to Appendix C, and a map (Map S-1) showing general soil types has been developed.

Western Watersheds Project, Inc.

P.O. Box 280

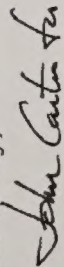
Mendon, Utah 84325

435-753-2701 • utah@westernwatersheds.org

Health Standards and Guidelines without complying with the spirit or letter of the law is not sufficient.

Given the conditions described in the RMP/EIS and the inability of BLM to manage livestock and protect the public's resources, the complete removal of livestock appears to be the only effective tool to restore these damaged lands. A thorough analysis of "No Grazing" incorporating those elements described above is essential. WWP looks forward to receiving your revised analysis with meaningful changes to address the health of our lands.

Yours truly,



Jon Marvel, Executive Director



February 5, 2002

The Klamath Tribes

P.O. Box 436
Chiloquin, Oregon 97624
Telephone (541) 783-2219
Fax (541) 783-2029
800-524-9787

RECEIVED
FEB - 7 2002
LAKEVIEW, BLM

Dwayne Sykes
Bureau of Land Management
Lakeview District Office
HC 10 Box 337 - 1300 South G Street
Lakeview, OR 97630

RE: Draft Lakeview RMP EIS Comments

Dear Dwayne:

Following are comments of the Klamath Tribes' Natural Resource Department on the Draft Lakeview Resource Management Plan (RMP) Environmental Impact Statement (EIS).

266-1

The Draft EIS does not appropriately consider and address the depth and scope of the Treaty rights and interests of affected tribes. Because of this, it is recommended that the Final Lakeview RMP EIS be revised to provide adequate guidance and accountability to ensure that the BLM substantially meets its trust obligation. This concern, and recommendations to address it, is further discussed below.

The Klamath Tribes entered into a Treaty with the United States in 1864. The federal courts have upheld that the Tribes' Treaty Rights, which include off-reservation interests, have survived termination of the Tribes and the transfer of ownership of the reservation. The United States, therefore, has a trust responsibility to protect the Klamath Tribes' Treaty rights. Under its trust responsibility, the BLM must ensure, in consultation with the Klamath Tribes, the Tribes' Treaty rights and the resources on which those rights depend are protected to the fullest extent possible. To ensure that the Bureau of Land Management fulfills its trust obligation to the Klamath and other tribes, it is imperative that the Draft Lakeview RMP EIS be revised to include clear policy direction that will guide appropriate tribal consultation, and facilitate a meaningful and substantive role for affected tribes in development of management policy, and during planning and implementation of resource management activities. Further consultation and coordination with affected tribes will be necessary to develop and incorporate adequate policy into the Final Lakeview RMP EIS.



266-1: Appendix B1 includes a list of legal authorities, including laws and Executive orders pertaining to consultation and trust responsibilities. Where Native American issues are involved, the BLM would follow the applicable laws, regulations, and policies. We currently consult on all activities we think would impact Native Americans.

To addresses consideration and protection tribal interests during development of the Interior Columbia Basin Ecosystem Management Plan (ICEBEMP) Final EIS and resulting proposed decision, an intense and responsive consultation process with affected tribes occurred. This resulted in development of objectives, standards and guidelines that were incorporated throughout the ICEMEMP Final EIS. Policy for the Final Lakeview RMP EIS could be developed from the existing policy contained in the ICEBEMP Final EIS proposed decision document and incorporated as appropriate. All relevant policy, and specifically that included in the ICEBEMP Proposed Decision on pages 74 through 77 (enclosed), could be modified appropriately in consultation with the Klamath and other affected Tribes, and incorporated into the Final Lakeview RMP EIS.

266-2

The Introduction, Affected Environment and Management Alternatives sections of the Draft EIS should be revised to contain sections describing and addressing tribal rights and interests. These sections should clearly describe the trust responsibility and requirements to appropriately consider and substantively address tribal resource concerns. It may also be helpful to describe potential tribal issues and concerns, including Treaty resource protection and management, religious/traditional/cultural uses, cultural resource site protection, traditional plant gathering, water quality, migratory game, visual/aesthetic values, socio-economic impacts, etc.

Impacts of the various alternatives on affected tribes must also be appropriately assessed and displayed in the Environmental Consequences section. As discussed, negative impacts to Treaty rights and interests must be adequately considered and mitigated to the full extent possible to meet the trust obligation. If adequate policy is developed and incorporated as described above, then the Department would support selection of Alternatives C or D, with the following recommendations.

266-3

It is recommended that the Department of the Interior be petitioned to withdraw the entire planning area for locatable mineral entry, as proposed in Alternative E. If withdrawing the area from mining is not is not feasible, or otherwise cannot be accomplished, at a very minimum, mining activities must not be exempt from the National Environmental Policy Act planning process, and should be consistent with the Treaty trust obligation and intent of the RMP and alternative selected.

266-4

It is recommended that seasonal road closures should be in effect on all big game winter range under BLM jurisdiction and management.

266-5

Big game forage values should weigh heavily in wildfire management plans for the Lakeview Resource Area (LRA), particularly in the Fort Rock and Silver Lake Area, as this comprises the majority of mule deer winter range of

266-2: Please see response to comment 266-1.

266-3: Please see response to comment 107-1.

Mining activities are not exempt from NEPA. However, NEPA is only one of many laws to which the BLM must adhere when considering any proposed mineral development operation. Any plan of operation level mining activity, mineral leasing, or sale of minerals would be analyzed through preparation of a categorical exclusion, environmental assessment, or environmental impact statement, depending on the size and magnitude of the proposed operation.

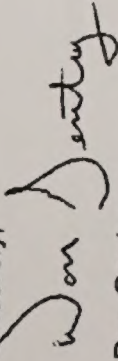
266-4: We analyzed the number of roads and accessibility in all of our concentrated mule deer winter range habitats. Areas with high road densities and easy access were proposed for seasonal or long-term road closure. This covers the majority of high density mule deer and elk winter ranges. Bighorn sheep

concern to the Tribes. Similarly, pronghorn antelope winter range forage is highly susceptible to loss through both wildfire and prescription burns.

Sage grouse habitat values should weigh heavily in wildfire management plans for the LRA. In addition, seasonal road closures may be appropriate to protect sage grouse leks.

I greatly appreciate opportunity to submit additional comments for consideration at this time. If you have questions or wish to communicate further on this issue, please contact me at your convenience.

Sincerely,



Don Gentry
Natural Resource Specialist

Enclosure: 1

winter ranges currently have low road densities. Pronghorn antelope winter ranges are highly variable, depending on winter weather conditions. It would be difficult to find specific areas where road closures would be effective for pronghorn antelope. The areas included in the season closure and limited to existing roads and trails category were expanded in response to comments. Refer to Table 4-5 and Maps R-7 and SMA-24.

266-5: Treatments are carefully planned by an interdisciplinary team of resource specialists to ensure all possible effects, including big game forage and greater sage-grouse values, are considered in project planning and implementation. Any proposed projects that could affect Tribal interests would be coordinated with the Tribes.

As indicated in the "Greater Sage-Grouse Interim Management Guidelines" (Sage Grouse Planning Team 2000), wildfire is a major concern in greater sage-grouse habitat.

RECEIVED
FEB - 6 2002
LAKEVIEW, BLM.

February 5, 2002

Dwayne Sykes- RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview, OR 97630

Dear Sir:

I understand that your opportunity to comment on the Draft Resource Management Plan period is over but I would like to make this comment. I would like to see that the Zone 2 area would allow disposal of any lands to agricultural purposes where the need arises.

267-1: Please see response to comment 255-1.

I have a field that has two pivots that overlap in their circles and we would like to add 40 acres to this area to allow us to spread these pivots out to make two complete circles. The land we are interested in is in T33s R18w, Section 10.

Sincerely,

Alan D. Withers

Alan G. Withers
42642 Highway 31
Paisley, OR 97636

RECEIVED
FEB - 6 2002
LAKEVIEW, BLM.

02/04/02

Dwayne Sykes
BLM
HC 10 Box 337
Lakeview, Oregon 97630

268-1

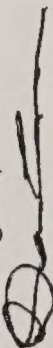
We would ask that the following lands be identified for disposal by BLM:

- 1.) T.L. 1800 of map 37 24 being 25.56 acres also being Government Lot 1 of Sec 10, T. 37 S., R. 24 E., W.M., Lake County, Oregon.
- 2.) A portion of T.L. 2900 of map 37 24, said portion being more particularly Described as Section 22, T. 37 S., R. 24 E., W.M., Lake County, Oregon.

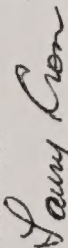
One will note that both parcels are isolated parcels surrounded by private lands. Both have questionable access and appear to be non-accessible to the public.

268-1: Please see response to comment 1-1.

Best Regards,



Dan Cron



Laury Cron
26277 Plush-Adel Rd
Plush, Oregon 97637
(541)947-5164

Comments on the Lakeview Draft Resource Management Plan/EIS Impact Statement
Submitted by Joe Cahill, Permittee Lakeview District

Dwayne Sykes
RMP Team Leader
BLM
HC 10 Box 337
Lakeview, OR 97630

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LAKEVIEW, B.L.M.

**Subject: Please enter the following into the record as
comment on the Lakeview Draft Resource Management
Plan/Environmental Impact Statement.**

Submitted by:
Joe Cahill
Permittee Lakeview District

While understanding the need for the proposed draft RMP/EIS. It is such
a cumbersome manuscript it is practically impossible to digest and comment on
the entire volume.

Therefore, the following comments will be abridged to which alternative
A-E I personally feel are best suited for each resource program as summarized in
table 3-1 of Volume 1. After this I will follow up with comments on the
ACEC/RNA proposals in general along with the proposed ACEC/RNA and wild and
Scenic River site that I am most familiar with.

My name is Joe Cahill. My family has ranched in the Adel area since 1912
during which time we have ran cattle on private and public lands. My personal
background is one of growing up in Adel, graduating from Lakeview High School
and receiving a double Bachelor of Science Degree in Agriculture Economics and
General Agriculture from Oregon State University.

**PLANT COMMUNITIES
SHRUB STEPPE**

Management Goal 1

Preferred Alternative -D- with the exception of the two comments.

- 1) More use of prescribed burning to especially control invasive juniper.
- 2) Rest burnt or reseeded areas 1 full year with proposed use after seed
head maturity during second year.

Management Goal 2

Preferred Alternative -A-

Note:

If ecosystem is healthy and functioning should be evaluated on case-by-
case basis.

269-1

269-1: In the Forest and Woodlands, Management Goal 2, section of Chapter 3
is a discussion about the control of juniper and how up to 75 percent of the early-
to mid-successional stages of western juniper stands would be treated by fire or
mechanical treatment, depending on the alternative. The rest period from grazing
following a fire is a minimum of two growing seasons under Alternatives A and
D.

RIPARIAN/WETLAND VEGETATION

Management Goal 1

Preferred Alternatives combination -A & D

NOTE:

So much emphasis has already been placed on riparian areas; to identify riparian Conservation areas would be a waste of time and energy. However, the modification or improvement of existing spring development is always a good idea.

269-2

269-2: The intent of designating riparian conservation areas is to emphasize the entire stream system, including the flood plains that are integral to stream function. Including riparian conservation areas, consideration in management would be critical to the completion of total maximum daily loads. Designation of riparian conservation areas would not, in and of itself, substantially change the current management.

FOREST AND WOODLANDS

Management Goal 1

Preferred Alternative -D

Management Goal 2

Preferred Alternative -D

SPECIAL STATES PLANT SPECIES

Preferred Alternative - A

NOXIOUS WEEDS AND COMPETING UNDERSIREABLE VEGETATION

Preferred Alternative - C with the following exception

- 1) I do not think that more time or money needs to be spent on public education. More priority should be placed on controlling the weed problems the resource area has now. The Warner Wetlands as a prime example.

SOILS

Preferred Alternative -A

WATER RESOURCE/WATERSHED HEALTH

Management Goal 1

Preferred Alternative - D

Management Goal 2

Preferred Alternative - A

- 1) Any other alternative is a prelude to exclude grazing from any water sources.

FISH AND ACQUATIC HABITAT

Preferred Alternative -D with the following exception
Item #6

Pertaining to the acquisition of water rights for in stream use. The mere thought of the government having water rights sends shivers down my spine and would hope to have this statement completely deleted from the RMP.

WILDLIFE AND WILDLIFE HABITAT

Management Goal 1
Preferred Alternative -D

MANAGEMENT GOAL 2

NOTE: With the exception of very successful crested wheat seedlings. This is a sagebrush area; the plant is going to grow no matter what, so it seems a bit silly to manage for it.

Management Goal 3
Preferred Alternative -- D

Management Goal 4
Preferred Alternative -- A

SPECIAL STATUS ANIMAL SPECIES

Preferred Alternative -- D

LIVESTOCK GRAZING MANAGEMENT

Preferred Alternative -- D

WILD HORSES

Preferred Alternative -- D

NOTE: Important to keep populations at the specified levels

SPECIAL MANAGEMENT AREAS

Preferred Alternative -- a

NOTE: The Lakeview Resource Area has no need for any new A.C.E.C's. Just another layer of bureaucracy that is unneeded and uncalled for.

WILDERNESS STUDY AREAS

NOTE: No preference here. These areas have been WSA for more than 20 years. The time has come to either designate wilderness or not.

269-3

269-3: The BLM currently holds a number of water rights for livestock, wildlife, and fish beneficial uses. Water flows are critical to fish habitat and water quality management. If a willing seller offers water rights that would benefit fish and water quality resources, it would be in the general public's best interest for the BLM to acquire those rights. In the Goose and Summer Lake Basins on BLM-administered land, no provision has been made to allow instream water rights to protect minimum flows. The only other provision to meet these needs is to acquire the rights and convert them to the instream flow beneficial use for fish and water quality. Acquired rights would be subject to the same management requirements of Oregon water law as any other right, including priority date and application to beneficial use. Each acquisition would be considered on a case-by-case basis. See also comment response 217-16.

269-4

269-4: Only Congress can designate an area as wilderness or release an area from wilderness interim management. This is usually dependent on widespread

support and consensus among interest groups. Congressional action to designate or release WSA's has occurred in recent years in California, Arizona, and in the Steens Mountain area. There is no known movement by Congress to make this decision for the State of Oregon.

WILD AND SCENIC RIVERS

Preferred Alternative -- A

NOTE: This area will be addressed later.

CULTURAL AND PALENTOLGICAL RESOURCES

Management Goal 1

Preferred Alternative -- D

Management Goal 2

Preferred Alternative -- D

Management Goal 3

Preferred Alternative -- A

NOTE: No new ACEC

Management Goal 4

Preferred Alternative - A

HUMAN USERS AND VALUES

Preferred Alternative -- a

NOTE: No new ACEC's need to be added.

AIR QUALITY

Preferred Alternative -- D

FIRE MANAGEMENT

Management Goal 1

Preferred Alternative -- D

Management Goal 2

Preferred Alternative -- D

Management Goal 3

Preferred Alternative -- D

RECREATION

Preferred Alternative -- D

NOTE: Pertaining to Warner Wetlands -- perhaps less money spent on recreation and more money spent on weed control or soon there will be nothing left to recreate on.

OFF HIGHWAY VEHICLE USE

Preferred Alternative -- D

Comments on the Lakeview Draft Resource Management Plan/EIS Impact Statement
Submitted by Joe Cahill, Permitte Lakeview District

VISUAL RESOURCES

Preferred Alternative -- A

NOTE: No new designations of WSR or ACEC

ENERGY AND MINERAL RESOURCES

Management Goal 1

Preferred Alternative -- A

Management Goal 2

Preferred Alternative -- D

Management Goal 3

Preferred Alternative -- A

LANDS AND REALTY

Management Goal 1

Preferred Alternative -- A

269-5

NOTE: Lake County is already over 80% publicly owned. The United States Government should not be in the business of acquiring even more lands as stated in alternatives C&D.

Management Goal 2

Preferred Alternative -- D

Management Goal 3

Preferred Alternative -- D

Management Goal 4

Preferred Alternative -- A

ROADS AND TRANSPORTATION

Preferred Alternative -- D

269-5: The "Fiscal Year 1992 Congressional Appropriations Act" directed the BLM to maintain the private/public land ownership ratio as it existed on September 30, 1991, in both Lake and Harney Counties. The directive is still in effect and applies to all forms of acquisition, including exchanges, and to all alternatives considered in the RMP. Currently, in Lake County, the BLM administers approximately 900 fewer acres than it did on September 30, 1991. The text in Chapter 2 and Appendix B has been modified to clarify this issue. As stated in the Proposed RMP/Final EIS, we are interested in acquiring lands in SMA's, such as ACEC's and WSA's. However, any such acquisitions would have to allow exchange or sale of other BLM-administered lands to stay within the identified ratio.

**WILD AND SCENIC RIVER DESIGNATION
TWELVE MILE CREEK**

NOTE: Opposed.

As the owner of the 90 acre parcel smack dab in the middle of the corridor, we have some very real concerns with the proposed designation.

Basically, what is this going to do to the value of the property? In the past, we have expressed a willingness to trade; unfortunately these ventures have been fruitless. For this reason alone, I am opposed to the proposed designation.

**ACEC/RNA's
RAHILLY – GRAVALLY**

The proposed designation here seems to be driven by two points in particular.

- 1) Cultural sites
- 2) Sensitive Plants – Coopers Goldflower

The present management practices appear to have no effect on either of these points. Even if there is potential for conflict from grazing on the Coopers Goldflower, isn't a 20,000 acre ACEC a little extreme to protect 4 known sites?

Our greatest concern is that an ACEC designation is just another layer of unneeded bureaucracy, and a prelude to exclude some multiple use practices; grazing in particular.

SPANISH LAKE

As stated in the comments for Rahilly – Gravally, this proposed ACEC/RNA appears to have no ill effects from the current management practices. Thus, the designation would appear to be just another layer of bureaucracy that is uncalled for, while being a stepping-stone to halt some multiple use practices.

269-6

269-6: The WSR designation would not affect private property. Under the “Wild and Scenic Rivers Act,” designation neither gives nor implies government control of private lands within the river corridor. Although Congress could include private lands (inholdings) within the boundaries of the designated river area, management restrictions would apply only to public lands. The Federal government has no power to regulate or zone lands under the authority of the “Wild and Scenic Rivers Act.” Private landowners within a river corridor would be able to use their private property as they had prior to designation. WSR designation generally causes property values to increase or remain stable. The BLM is obligated to provide reasonable access to private property. See response to comment 70-6.

269-7: See responses to comments 114-3 and 189-1. It is agreed that the present management practices appear to have little or no effect on Cooper’s goldflower; however, that is just one of many resource values identified in the area. The Tribes have expressed an interest in collecting cultural plants, such as epos, in the area. That, plus other cultural concerns, drives the need for special management. The proposed ACEC contains prehistoric and historic cultural resources and plant communities. The RNA is based on the presence of three ONHP plant community cells: western juniper/big sagebrush and bitterbrush; mountain brush (includes squawapple) and bitterbrush-sagebrush; and mountain snowberry and Thurber’s needlegrass mosaic (refer to Table 2-33). The fact that Cooper’s goldflower grows in the proposed ACEC simply adds to the other resource values present. Its management does not propose to exclude any multiple use practices. Mineral location would require preparation of a mining plan of operations prior to any surface disturbance, but it would not be precluded entirely.

269-7

The plant communities around Spanish Lake are unique in Oregon, as they represent what is commonly found more to the south in the Great Basin. These salt desert shrub communities are adapted to high salinity in the soil and are especially vulnerable to wildland fire, noxious weed invasion, and livestock and wildlife use. In "The Great Basin: Healing the Land" (USDI-BLM 2000g), guidelines for restoration of disturbed areas of the Great Basin are put forward; two are significant for the Spanish Lake area. First, it is acknowledged that research is needed for this plant community—that can be accomplished and encouraged in the RNA. It is also stated that, "The Great Basin must be managed for no net loss of sagebrush habitat and salt desert shrub habitat." Loss of complete salt desert shrub stands or breaking large stands into small, isolated patches results in habitat fragmentation and the associated decline in native plants and wildlife. It also increases the likelihood of further invasion by cheatgrass and noxious weeds. An ACEC designation would help manage this unique ecosystem and would give direction for research and serve as a representation of an intact system.

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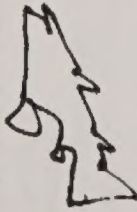
Mr. C. J. Ellis

I understand BLM is reviewing
management plan for
its Laramie Resource Management
Project.

I urge BLM to reject
alternative D. I support
strongly alternative C
that excludes livestock grazing
& off road vehicles from
proposed wild & scenic rivers
critical fish & wildlife habitats
WSAs, sage grouse lands.

GRAZING AS USUAL HAS TO
STOP. IN THE LONG RUN THE
PEOPLE OF THE U.S. WILL
BENEFIT MORE FROM IMPROVED
WILDLIFE HABITAT THAN FROM
SUBSIDIZED GRAZING ACTIVITIES.

THANKS FOR CONSIDERATION. Hjh





For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

January 30, 2000 **RECEIVED****FFR - 8 2002
LAKEVIEW, B.L.M.**Dwayne Sykes
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, Oregon 97630

Regarding: Draft Lakeview RMP/EIS

Dear Dwayne:

While I have not read the entire document (its really quite a large endeavor) I have reviewed it and with my personal knowledge of the District I have the following comments:

Preferred alternative: I agree that Alternative D is the preferred alternative to guide the plans future and which strikes a balance in protecting and improving natural values while providing commodity productions. That, after all is the BLM's mandate under FLPMA.

Noxious weeds: I am pleased to see this management goal included. The spread of noxious weeds on public lands in the western states is an emerging national problem.

Areas of Critical Environmental concern: The designation of ACECs is provided for in FLPMA but my concern is that BLM's definition of an ACEC has been distorted to the point that there is no distinction between an ACEC a NCA or a National Monument. In addition, each BLM State has its own definition of what can be an ACEC. In my view FLPMA was directed at small public land areas that are critical and need protection and need recognition when activities are planned near them that could impact them. Many of your ACECs are so large that they should be NCAs or National Monuments. I just believe your definition of ACEC needs to be thought about carefully and use other means to designate the larger areas that need special protection. If this is not done BLM could loose an important tool to protect such critical areas as Sage grouse booming grounds or small archeological features.

Wilderness Study Areas: I am not knowledgeable of the over all Wilderness situation in the district. My concern is that all Wilderness candidate areas need to be forwarded to Congress at an early date and the former WSAs restored to multiple use management quickly. As I recall FLPMA gave BLM 15 years to do this and that was 25 years ago. So my hope is that your plan envisions putting the Wilderness question to bed quickly.

Lands and Reality: I realize that the land pattern of the district is not too fragmented and yet there are several areas where the pattern can be improved to improve management efficiency of both private and public land. I encourage the District to become proactive with a land exchange program where isolated tracts of public land are

271-1

271-1: Please see response to comment 2-3

271-2

271-2: Please see response to comment 269-4.

(703) 790-1988

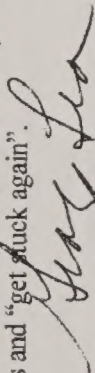
www.publicland.orgleuplf@erols.com

L-271

used as trading stock to acquire inholdings of private land. Areas near Plush, Adel and Fort Rock are good examples where an aggressive land exchange program would be quite beneficial to all parties.

Public Access: Alternative D states that access will be accomplished "where public demand needs exists". I would hope that the plan will become more aggressive in this program and identified those areas specifically. In this manner the public, State and local interests can become aware of the need and perhaps aid in their solution. Hunters need to be asked, "What areas do you not have access to", particularly where private land or locked gates have become the problem.

I hope my comments are of value to you. I still have a warm place for the public land of the District and before I get too much older, I want to spend a few days and knock around the desert to visit old friends and places and "get stuck again".



George Lea (citizen and President of the Public Lands Foundation)

Draft

The Lakeview Resource Management Plan Sub-committee of the Southeastern Oregon Resource Advisory Council met on January 14, 2002 at the BLM office in Burns, Oregon. Present were subcommittee members Chad Boyd, Howard Brooks, Tom Harris, and Bob Kindschy, and BLM representatives Scott Florence, and Dwayne Sykes. The following is a synopsis of subcommittee comments on the draft Lakeview RMP. Comments are referred to by volume and page of the plan, and are listed in order of occurrence. Most comments related to Chapter 2 (Affected Environment) of Volume 1, as this chapter had not been reviewed previously by the sub-committee. We look forward to discussing the draft RMP and our comments with you at the next SEORAC meeting.

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LAKEVIEW, B.L.M.

Volume	Page In general	Comments
	In general	It would be instructive to have a figure indicating which OHV trails and roads were valid for use under the different alternatives.
	In general	It should be mentioned early in the document that existing allotment management plans would not necessarily be affected by this RMP.
	In general	We recommend making all tables "stand alone" so accompanying text is not needed to interpret them.
1	S-9	We suggest expanding this table to include additional explanation of what locatable, leasable, and salable minerals are referred to in the table (i.e. cross-referenced to appropriate section in RMP).
1	1-5	In "Issue 3," the word "maintain" should be added so that this statement applies to riparian and wetland resources that are already functioning properly.
1	2-2	In the "Physiography" description we suggest a wording change to indicate that the Tertiary rocks of the resource area are probably underlain by Paleozoic and Mesozoic marine basin sedimentary and volcanic rocks similar to those that are widely exposed in the Blue Mountains to the north.
1	2-6	The text suggests that mountain mahogany is a minor component of juniper communities. A more accurate statement would be to say that mountain mahogany is a minor component of old growth juniper stands, and that invasive juniper may have reduced the abundance of mahogany.
1	2-6	We suggest inclusion of Wyoming big sagebrush communities in the description of plant communities in the resource area.
1	2-11	Acreage of western juniper should, to the extent possible, be broken down into old growth vs. invasive stands.
1	2-23	It is stated that "...it is unknown if the natural temperature potential (of streams in the resource area) would meet the criteria (state DEQ standard for temperature)". We suggest

- 272-1
- 272-2
- 272-3
- 272-4
- 272-5
- 272-6
- 272-7
- 272-8
- 272-9
- 272-10
- 272-1: Refer to Table 4-4, which shows resource area-wide OHV designations for each alternative, and Maps SMA-5 through SMA-32, which show the proposed road closures for the preferred Alternative D. Preparation of a map showing the road closures proposed for each alternative would require over 100 individual maps.
- 272-2: Reference is made to allotment management plans in the Livestock Grazing section of Chapter 3 and indicates that current grazing levels would be maintained until an evaluation of monitoring data or assessment of the Rangeland Health Standards and Guidelines identifies a need for adjustment to meet resource objectives. Applicable allotment management plans would be revised as warranted.
- 272-3: Comment noted. Redundant tables have been removed and a number of tables have been updated with new information, including footnotes that assist in clarifying the data presented.
- 272-4: A footnote that references the definitions of locatable, leasable, and salable minerals in Chapter 6, Glossary, has been added to Table S-1.
- 272-5: The text has been changed to reflect your concern.
- 272-6: This change has been made to the text in Chapter 2.
- 272-7: Mountain mahogany usually occurs as a minor component in mountain big sagebrush-grassland community, and in shrub/juniper communities on edaphic conditions such as steep, rocky slopes and ridges. In the LRA, mountain mahogany is not restricted to old growth juniper stands. According to Gruel

Draft

1	2-47	adding "...or if the criteria itself accurately reflects the temperature regime needed to maintain a functional riparian system in the High Desert ecoregion."
1	2-62	In the second paragraph of the first column, the word "seral stage" is said to be a synonym for "range condition." This is incorrect and should be deleted. Range condition is a value-laden judgment (i.e. poor, fair, good or excellent) relative to the needs of grazing livestock. Seral stage refers to an ecological property of a plant community and does not assign value. We suggest that BLM provide reference to more specific plans for restoration/maintenance of the Shirk Ranch and Military Road properties.
1	2-69	In the financial figures for recreation-related spending we suggest inclusion of OHV-associated monies under the "travel-related spending" category.
1	2-77	Text indicates that crested wheatgrass communities have the potential to burn more frequently than native plant communities. Evidence in support of this point is lacking; in fact arguments can be made to the contrary. We suggest deleting the statement.
1	2-84	We suggest clarification of last sentence of second paragraph in the "Geology and Minerals" section. The potential exists for the discovery of additional deposits of perlite associated with dacitic and rhyolitic rocks. Also, it is possible that metallic mineral deposits were formed at shallow depths by ascending hot fluids associated with the volcanic and hot spring activity.
1	2-87	In the section dealing with mineral restrictions, we suggest specifically mentioning what areas non-discretionary closures would affect, and indicating whether WSA's would fall under the non-discretionary heading.
1	Section 3	Both 10 and 20-year time frames are implied for the scope of time for management implementation. We suggest clarification.
1	3-3	We suggest dropping the idea of roads being a rangeland habitat component.
1	3-14	Under item 7, Alternative A, we suggest changing "Roads could be maintained to minimize impacts to riparian zones" to "Roads should..."
1	3-20	Under Management Goal 2, we suggest incorporating Alternative B into Alternative D. This would allow for reestablishment of big sagebrush habitat under Alternative D.
1	3-23	Under item 3, Alternative C, we suggest specifically indicating that vegetation monitoring data should drive the process of evaluating the appropriate management level for horse populations.
1	3-25	Item 2 should allow for acreage additions to ACEC's during the life of the plan.

(1985), "Although establishment and growth of mountain mahogany once was limited by occurrence of frequent surface fires, it and other fire-sensitive shrubs and trees proliferated after livestock diminished grasses and fire exclusion fostered mahogany establishment, growth, and soils to deep, fine-textured soils throughout the Great Basin. Consequently, the great majority of mahogany in the interior West are less than 125 years old." An example of this is the mahogany forest at the ponderosa pine forest edge south of Picture Rock Pass where no fire has occurred since 1862 (Miller, R., personal communication, 2002).

272-8: Big sagebrush shrubland (see Plant Communities section of Chapter 2) includes Wyoming big sagebrush because there is very little Basin big sagebrush in the resource area. About 70 percent of the *Artemisia tridentata* is subspecies *wyomingensis*, 5 percent is *tridentata*, and about 25 percent is *vaseyana*. In many cases, the Wyoming and mountain sagebrush are mixed, depending on soils; higher elevation is not always the indicator of the subspecies *vaseyana*, as in other areas, such as Harney County.

272-9: Our current inventory identifies areas of juniper occurrence, but does not break down habitat by age, size, or density class. Overall, for the Northern Great Basin in the last 100 years, there has been at least a fourfold increase in western juniper over its historical area. Applying this to the LRA, approximately 80 percent of the juniper woodlands (about 170,000 acres) would be less than 100 years old or invasive to historically non-juniper sites.

272-10: The suggested wording has been added to the text.

272-11: The term *range condition* will be replaced by *similarity index*, which is the present state of vegetation on an ecological site in relation to the historic climax plant community for the site.

272-12: The BLM completed an assessment report for the Shirk Ranch in 2002. The assessment outlines basic stabilization and restoration needs/opportunities. The assessment would be used to seek funding to accomplish basic stabilization needs. There are some ongoing discussions on forming a group, such as Friends of Shirk Ranch, which may help with labor and funding (and be the basis for matching BLM funds). We are also presently preparing a national register nomination for the site. We do not have any specific site plans for the Military Road.

272-13: The figures cited for recreation-related spending are inclusive of OHV visitation. The BLM relied on a recent annual publication of the Oregon Tourism Commission, "Oregon Travel Impacts and Visitor Volume." This annual report is prepared using an economic model that estimated economic impact based on visitors of all types, including OHV users. The text has been updated in the final plan to use information from the most recent annual report.

Draft

1	3-32	Under item 2, Alternative D indicates "same as C." In keeping with the theme of Alternative D, this should more likely read "same as A."
1	3-34	Under Alternative D, management goal 2, we suggest clarifying whether the acres to be kept open to mineral leasing include the acres to be opened to mineral leasing. BLM should also clarify whether open areas would include WSA's and we suggest adding a figure indicating areas to be closed to mineral leasing.
1	3-43	Last paragraph states that alternatives C and E would provide "fastest results" in reaching desired conditions for riparian/wetland vegetation. The reasoning behind this statement is not clear. Under Alternative E management is essentially relegated to doing nothing. How would this speed progress toward desired condition?
1	4-16	Paragraph 3 in column 2 implies that off-site water developments would increase the negative impact of horses on riparian resources. Reasons for this effect are unclear. Off-site water developments should benefit riparian resources.
2	Appendix D	On page A-35, best management practices for mining indicate that sites should be reclaimed to the approximate original contour. This may not be possible. We suggest alternative language along the lines of "reclaim to the extent possible..." or "reclaim to a useful contour..."
2	Appendix E	We suggest clarifying the amount of forage being allocated to elk. It is confusing as written.
2	Appendix E	BLM often refers to "other wildlife." We suggest that species represented by this classification be indicated.
2	Appendix E	We suggest specifically stating that forage allocations are made based on the dietary preferences of cattle and do not necessarily reflect the food resources available for wildlife consumption.
2	Appendix K	We suggest adding additional information regarding management direction of cave resources, including more detailed analysis of bat populations.

272-14: The text has been changed as suggested.

272-15: The last three sentences in the paragraph were eliminated and amended to reflect your concern.

272-16: Additional information has been added to this section to identify discretionary and nondiscretionary closures.

272-17: Since the RMP is intended to provide guidance and direction for up to 20 years, actions could be implemented throughout the life of the plan, depending on funding. It is expected, however, that many, if not most of the management actions would be implemented within 10 years of the plan's adoption.

272-18: The text has been edited to remove reference to roads as being a rangeland habitat component.

272-19: The suggested change has been made to the text.

272-20: It was our intent that those actions in Alternative B would also occur in Alternatives C and D. We have reworded this section appropriately.

272-21: This need for and use of monitoring data are included in Appendix R. Vegetation monitoring is one of the key components of evaluating appropriate management levels.

272-22: Additional acreage can only be added to ACEC's (or newly-designated ACEC's) through the land use planning process. In other words, the BLM can not add new acres to ACEC's simply by adding the suggested text to this RMP. Instead, the BLM must initiate a new land use plan, plan amendment, or plan revision should new information become available that would warrant additional ACEC acreage consideration.

272-23: We have changed the summary under Alternative D to reflect your concern.

272-24: The last sentences have been changed.

272-25: On many systems, removing the impacting management activities is all that would be needed to improve those sites to their potential. Even on systems currently under a working grazing prescription, stream conditions have been adversely impacted due to livestock trespassing from adjacent pastures, utilizing riparian sites in scheduled rest periods, and exceeding use levels at other times. Under Alternative E, no grazing would occur in the adjacent pastures so the unauthorized use would be less likely to occur, resulting in improved stream conditions. As noted in several places in Chapter 4, there are other aspects of no active management that would be detrimental to riparian vegetation, including lack of juniper management, no instream project construction, and no management of wild horse and wildlife use. The sites that would have detrimental effects from no management are fewer than those that would benefit from lack of impact from currently authorized activities.

272-26: The statement in question cited the need to look at each case independently. If the development did not attract horses to an otherwise undisturbed and ungrazed riparian area, if the development itself did not impact the riparian resource by dropping water tables at springs and lakebeds, and if horse use was better distributed away from current riparian sites, then the effect could be positive.

272-27: Item 8 in the Mining section of Alternative D has been changed to reflect your concern.

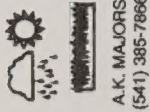
272-28: Wildlife allocations have been updated. See Table 2-26 and the Allotment Summaries in Appendix E1.

272-29: The category Other Wildlife referenced in Table 2-26, is now footnoted.

272-30: To explain the basis of forage allocations, a paragraph was added after the opening paragraph under the Wildlife and Wildlife Habitat section of Chapter 2.

272-31: Information on bats occurring on the resource area is contained in Appendix H2 in the Bat section.

The "Interim Management Policy for Caves" (USDI 1993) is listed in Appendix K of the Draft RMP/EIS.



RECEIVED
BUREAU OF LAND MANAGEMENT
HC 74 - 12533 HWY 20 WEST
HINES, OREGON 97738
FEB 1 2002
WETLANDS DIVISION

Dwayne Sykes - RMP Team Leader
Bureau of Land Management
1301 So. G. Street
Lakeview, Oregon 97630

RE: Comments on the Draft Lakeview RMP/EIS

Dear Mr. Sykes,

The following comments are hereby submitted on behalf of the MC Beatty Butte Grazing Association. These comments are based on my personal experience as Area Manager from 1966 to 1984, and as Range Manager for the Division of State Lands from 1984 to 1999. During this period of time I repeatedly made many inspections of the subject area on the ground and in the air, while conducting inventories, vegetative studies, and laying out rangeland improvements. A specific aspect of my work during that period involved initiation of various prescribed grazing plans for numerous allotments. This also involved in-depth long-term repeated photo plot recordation of the results of the various grazing schedules in close correlation to climatic conditions.

The draft Resource Management Plan (RMP) contains a magnitude of information. It would take an extensive amount of time to adequately review all aspects of this draft. Therefore, due to lack of time, I will limit my comments to a few aspects I feel I am most knowledgeable of, and some glaring issues that are in question.

ALTERNATIVES

Problems often occur because each alternative is viewed as standing alone without opportunity for adjustments. An example being alternatives B or C may have some parts that validly could fit within alternative D, but if D is chosen, it often is difficult to make additions or deletions. Example: Could the proposal for two ACEC'S in Hawksie Walksie be deleted from alternative D if it was decided they were not needed? If alternative E cannot meet management goals (as stated Volume 1,p.5-2) how then can it be a valid alternative?

Volume 1, p.3-3 Desired Range of Conditions: The statement that the desire is for "wild horse numbers to be in balance with the rangelands that support them", is a fallacy under present management direction. As long as any numbers of horses are allowed to continually occupy the same area year after year, their selective grazing habits will result in degrading vegetation and soil conditions of those areas they repeatedly graze. Under this situation, there is no "balance" with the rangelands. The only true way to view the situation is that fewer numbers of horses would result in less rangeland area being adversely affected. If the horses were periodically rotated between areas annually, allowing a chance for the plants affected to satisfy their growth requirements, only then would you possibly achieve some "balance within the rangelands that support them".

(1)

273-1

273-2

273-1: NEPA requires that the BLM analyze a reasonable range of alternatives. It is legally acceptable to develop a proposed plan/new preferred alternative within the final document that adopts components of the various alternatives. In this case, however, the BLM is only making minor changes to the preferred alternative in the draft document.

Some constituents support many of the management actions proposed in Alternative E. Many components of Alternative E would not meet some management goals or are not legally implementable. These components, therefore, do not meet the "reasonable" criteria, but it was included and fully analyzed in order to compare the relative nature of the impacts to other alternatives. To not address this alternative in detail could have opened up the BLM to a potential plan protest at the end of the planning process.

273-2: According to the "Wild Free-Roaming Horse and Burro Act," horses must be maintained within established herd management areas and cannot be moved to establish new herd management areas. While horses may move within a herd area on their own, we have no control over that. (Horses that move outside a herd area can be rounded up and removed.) Therefore, as noted in the commentor's letter, managing the number of wild horses in an area is the primary method used to balance wild horses with the rangelands that support them.

Volume 1, p. 3-5 Adaptive Management: This small section is possibly the most important within the whole RMP. The volume of information and direction within the plan matters very little, unless it can be applied soundly and efficiently on the ground. Application of proposed principles followed with valid common sense evaluation is the most important aspect of resource management. This requires many hours of on-the-ground, in-the-field inspections by dedicated curious-minded individuals. Adjustments and modifications are usually required, as on -the-ground applications often varies from the best of plans. It is most important that all resource evaluations are closely correlated with climatic conditions.

273-3

Volume 1, p.3-7 Monitoring: In this section, along with many other sections of the plan dealing with vegetation management planning, implementation, evaluation, analysis, and future directions and adjustments, there is a tremendous amount of "apple pie and ice cream" rhetoric. Much of what is proposed is really not measurable, impossible to adequately evaluate, and most likely would never be initiated due to lack of funds, personnel, etc. What is, or would be, undertaken very seldom would be followed through on due to change in direction, personnel changes, a new system, and many other factors. You need only review what has happened to past plans and data collected and determine what percentage of that information has been effectively used by the Agency. Realistic direction and studies that have the possibility of being followed through on would be much more effective and beneficial in the long term.

273-4

Volume 1, p.3-24 Special Management Areas: It is difficult to understand why there is very little, if any, difference between alternative C and D proposed management actions for SMA's. A prime example is the similar proposal of designating 12 ACEC's in both alternatives. It states livestock grazing use levels would be 20% higher and wild horse aum's higher under D than C (Volume 1, p.5-6). Such increases would very likely be substantially hindered with production restrictions on nearly 124,000 acres. Also, it is likely the ACEC and/or RNA proposals would propose eliminating livestock (and horse use?) on a number of these acres.

273-5

Two of these proposed ACEC's/RNA's are located in the Hawksie-Walksie and Sage Hen Hills WSA's, which is also part of the Beatty Butte Wild Horse Herd management area. BLM regulations define an ACEC as an area "within the public lands where special management is required to protect and prevent irreparable damage to any of many resource values, including natural systems or processes (Volume 2,p. A-237). The description and values for these two ACEC's (p. A-245) states "The most important ecological characteristic about the site is high quality grasslands...including excellent condition big sagebrush grasslands. It is also stated grazing has been light in the area due to lack of water sources and remoteness of Hawk Mountain. This lack of stock water is only true for the far eastern portion of the WSA and most of that area is not included in the proposed ACEC. Many years ago, a pipeline was put in from Actney spring, around the Mtn. to the SE to furnish H2O to livestock on the saddle between Actney and Hawk Mtn. It was operated off and on for many years up until around 1977. Water holes were dug in the low land lakebeds in the late 40's or early 50's, and then two deeper new ones were constructed there in the mid-late 70's. Under WSA regulations, these water sources can be maintained to their original construction. Numerous times from the 60's until 1983, large numbers of cattle were periodically placed in the Hawksie Walksie basin in early spring, and remained there until June or July (personal knowledge). The Hawksie Walksie area was also a favorite area for horses, which have the capability of going long distances to water. Mustang waterhole often had water in early spring to mid-summer, and horses covered the whole area from that source. If it is true that this area is high quality grasslands after many seasons of continuous grazing season use by sheep, cattle, and horses, and now the livestock grazing pattern has been greatly improved (less quantity of use and periodic total rest periods, and horse numbers are being controlled with an approved management plan)--then how in the world can it be determined "special management attention is required to protect and prevent irreparable damage to important---natural systems or processes" (Quoting 43 CFR PART 1610, the definition for an ACEC)???

273-6

Additional points on these two ACEC's: (1) Part of the western ACEC is within the SageHen Hills WSA, which has been recommended to be released for other uses than wilderness. It is further stated the proposed developments for livestock and wildlife "are judged to outweigh the limited wilderness values". (2) Map G-2 showing grazing allotments for alternative C shows the ACEC to the east smaller than the

(2)

273-3: A monitoring plan is included in Appendix R in the Proposed RMP/Final EIS and will also be part of the approved plan.

273-4: The primary differences between Alternatives C and D regarding ACEC designations are the amount of acres designated and how each area would be managed. For example, under Alternative C, most ACEC's would be closed to grazing and closed to the sale or lease of minerals. Under Alternative D, these areas would be open to grazing, and most would be open to the sale or lease of minerals.

273-5: The proposed Hawksie-Walksie ACEC/RNA has few functioning water holes within its boundaries. Three have been proposed for clean-up in 2002 within the proposed ACEC and one just outside of the boundary. None have been proposed in the two areas (old Hawk I and Hawk II) where the plant community cells are located. The pipeline has not functioned for some years, although it could possibly be repaired. During the last 10 years, the entire area has not received high livestock use; however, wild horses have exceeded the desired population numbers on occasion. A large number were gathered in the fall of 2001. More are proposed for gathering in September 2002. The concept of an RNA is to preserve representative plant community cells selected by ONHP and to prevent irreparable damage. The entire ACEC does not have high quality plant community values, but where located, they are in excellent condition. At present, the plan for grazing is to use the area every other year and graze between 300-1,500 AUM's of forage (about 50 percent of the permittee's preference). That means that at some later date, more livestock use could take place. Monitoring would be used to evaluate the effect of livestock and wild horse grazing. If there is documented damage to the resources, changes in grazing management would be made or the smaller areas (about 8,640 acres) could be fenced out. This would be considered part of the special management attention required to protect the ACEC values.

273-6: Cheatgrass out-competes native grass germination after disturbances, such as fire, mainly because it is an annual and gets a "head start" by germinating in the fall. It is not listed as a noxious weed in the State of Oregon, but the grass

one to the west, is this an error? Also it directs these areas to be excluded from grazing. How could this be done within the official boundaries of a wild horse herd area? And if that is possible, how could it really be justified if the vegetation condition is excellent under the past and present improved management? (3) Just across the District boundary to the east the Burns District already has a NRA in Long Draw which serves much of the same purpose of this proposed NRA. Also, many acres in the adjacent Sheldon Refuge, where livestock have been excluded for numerous years, would better serve the same purpose as that intended for the proposed ACEC's.

Following are additional statements and/or indications within the RMP that I believe are in error, or at least highly questionable:

Volume 1, p.2-7 Modified grassland: The statement that "cheatgrass can out compete the native grasses by germinating in the fall", is basically completely false. This is especially in error when sound grazing practices are being applied to the native greases. Cheatgrass in this high desert ecosystem is no more than an advantageous species; taking advantage of disturbed sites and additional extra moisture. It basically grows as a "fill in" species. It can have high forage value in early spring for livestock and wildlife, and also serves as extra ground cover and litter on many sites. It is not a noxious species as the ICBEMP study group would lead you to believe! There are not "large expanses of cheatgrass" in the LRA. Granted it will occur in higher density after disturbance, i.e. fire, but diminishes quickly when native species regain vigor within a few years.

Sagebrush and Rabbitbrush have not re-established (a more appropriate word than "invade") to a high degree on many crested wheatgrass seedlings, especially in the Wyoming big sage type, i.e. Brim, Coleman, and Abert seedlings that are nearly 40 years old.

Volume 1, p. 2-77...Fire Hazards: The statement that "large expanses of crested wheatgrass have the potential to burn more frequently than native plant communities" is completely false. In fact, the opposite is true; crested wheatgrass seedlings have often served as fire breaks on wildfire burns.

Volume 2, p. A-13: "Shrublands and herblands have declined owing to-- conversion to crested wheatgrass and other desirable exotic grasses." Comment: Most areas converted to crested wheatgrass, or other introduced perennial species, have not declined, and actually possess improved hydrologic integrity to capture, store, and release water; which is a major objective with the Watershed Health Portion of the RMP.

Volume 2, p. A-13: "Warner Lakes and Guano Subbasin support large infestations of Medusahead and Mediterranean Sage." Comment: There is very little medusahead in these Sub-basins and the Med Sage is concentrated in the Abert Rim area, and none in the Guano Subbasin.

Volume 2, p. A-58: Under identified resource conflicts/concerns it indicates TuiChub habitat exists within allotment 00215. Comment: Comprehensive repeated inspections of the Piute drainage on State land below allotment 00215 revealed no existences of the Tui Chub and basically discounted the possibility that it could exist in any of the Piute drainage above Piute reservoir.

Volume 2, page 61: I do not believe there is any "quaking aspen" within Sandy Seeding #00218, as well as, it is very unlikely the small amount of Juniper are impacting much of anything. More likely it serves as improved bird and deer habitat.

Volume 2, p. 63: Some of the 1975 AAMP objectives listed here do not apply to the Fisher Lake allotment, rather they are for allotment 00202. This similar situation exists within the write-ups for other allotments as well. Also, Allotments 00225 through 00228 are shown on the map but not described in the allotment summary.

Volume 2, Appendix E: Comment: All of the FRF allotments have numerous "Identified resource conflicts/concerns" listed, along with detailed management direction. Many of these public land parcels are isolated, surrounded by private land, with access highly restricted. The management direction proposed would be nearly, if not totally, impossible in many of the situations, and/or very expensive. In no case did I find "land disposal" as a viable management direction, which I certainly believe would be a prudent consideration. Many of these isolated parcels do not have significant resources or public values, and the problem of access should weigh heavily in regard to what values they may have.

(3)

has many negative impacts on the natural ecosystems. Due to its fine fuel characteristics, the presence of cheatgrass populations has changed the fire regime in the entire West, causing hotter fires with higher frequency. Introduced annual grasses have invaded sagebrush steppe partially as a result of excessive livestock grazing pressure (Vavra et al. 1994). The presence of cheat grass also tends to favor the ability of noxious weeds to become established in those disturbed areas. At present, there are about 76,595 acres of cheatgrass communities in the LRA. There are few if any examples of high density cheatgrass areas where native species have regained vigor and replaced the cheatgrass in this part of the Northern Great Basin.

273-7: Where crested wheatgrass seedlings are used every year for spring grazing, sagebrush and rabbitbrush have invaded, unlike seedlings where grazing occurs in alternate years. The word *invaded* is used because of the ability of crested wheatgrass to maintain monotypic stands; however, depending on the intensity and timing of livestock grazing, shrub invasions would likely take place (West 1999).

273-8: The text has been changed.

273-9: The reference to the decline in shrublands and forblands is correct with respect to native plant diversity and ecological integrity. The introduction of nonnatives greatly affects these parameters. You are correct with respect to other physical factors, such as hydrologic integrity. In many instances, it is better to have some developed plant cover, even nonnative, if it reduces the potential for soil erosion or introduction of noxious weeds or cheatgrass.

This information on medusahead occurrence was taken from the ICBEMP descriptions of the subbasins in the resource area. As you state, our surveys have shown that there are no known medusahead sites in these two subbasins. However, these surveys have discovered small infestations of Mediterranean sage in the Guano Subbasin.

273-10: In a letter dated August 13, 1981 to A.K. Majors, District Manager, Lakeview, BLM, from Jack E. Williams, Staff Ichthyologist, USFWS, Sacramento, a population of chubs was reported in Paiute Creek in T40S., R27E.,

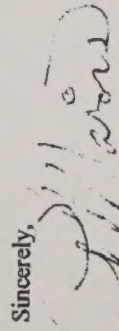
Volume 2, p. A-107: The management direction for this allotment refers to bighorn sheep habitat in the "Orijana Canyon area", which is not located in the allotment. Also, the proposal to allocate forage for elk, appears to be about as valid as allocating forage for Moose.

Volume 2, p. A-120: Comment: It does not appear appropriate that a "proposed" ACEC would require adjustment in grazing management, including levels and areas of use, season of use, and grazing system. Especially when there is an approved AMP in place formulated and enacted by a multiple resource value working group. The main point being that the need for any adjustment in grazing use should only be decided within the review process of the validity of the proposed ACEC criteria. Then grazing adjustments could only be enacted upon final decision of establishment of the ACEC, if it were so decided.

When I thought I was finished with this scanty review I decided to check back on AUM authorizations. Much to my surprise I found a major discrepancy (Volume 1, p. 3-22), the proposed authorization of AUM's under alternative A (defined as "continue present management") is 55,894 AUM's less than that allowed under present management. Alternative B, which is supposed to "emphasize commodity production", proposes to provide only 119,057 AUM's, which is 45,071 AUM's less than presently allowed. Alternative C proposes to cut the present active preference of 164,128 AUMs by 47%, and alternative D wants to provide a sustained yield of AUM's equal to Alternative A. WHERE IS THE WORLD DID THESE FIGURES COME FROM? Well, on p. 3-68 under Livestock Grazing Management it states "The current grazing levels would be maintained" and refers to Appendix E1, which shows total active preference for all allotments to be 164,128 AUM's. However, further on in the same paragraph, the following is stated "The level of AUM's of specified grazing use in the alternatives is based on the average authorized AUM's in the resource area from 1991 to 2000 at light to moderate levels." This is totally in error!!! Annually authorized AUM's includes non-use applied for and authorized. The 108,234 AUM's is the supposedly average actual use authorized over the 10-year period. But really what is the rationale to use this figure, when it is also stated in the same paragraph that "livestock permittees have the option to license up to their full active preference (164,128 AUM's) for any given year". The whole purpose of the RMP is to evaluate the full extent of the possible actions under each alternative. Whatever reasons exist for the lower actual grazing use over that 10-year period, is basically moot. In 1997 the actual use was 127,251 AUM's, why not use that figure? Is it possible that over 150,000 active AUM's could be allocated in 2002? Certainly. However, if Alternative D is accepted with its management goal of only providing 108,234 AUM's of livestock grazing use, where, when, and who takes the 34% reduction; and, where is the analysis of the impact of that action "to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands" (p. 2-40 Grazing Management Guidelines)??? It certainly is not contained in this proposed plan.

In conclusion, it appears a major adjustment is necessary in the proposed authorization of AUM's for livestock grazing use by Alternatives. Active preference must be used. I personally know that grazing use up to, and above, the preference level was made on numerous allotments repeatedly under good management practices. Yes, some years below, but also some years above. I sincerely hope my comments are helpful, and I believe Alternative D is the best management direction, with the indicated corrections and adjustments.

Sincerely,



A.K. Majors
Land Resource Consultant
64756 Saros Lane
Bend, Oregon, 97701

(4)

sections 28 and 33 in 1979. The reported sites are below Paiute Reservoir on BLM and State lands. The letter reported that these were thought to be at the extent of the downstream distribution of this population. This discovery is further reported in Williams and Bond (1981): "A new subspecies of Tui Chub (Osteichthyes: Cyprinidae) from Guano Basin, Nevada and Oregon." No fish have been found in Paiute Creek above the reservoir; however, their presence has not been ruled out.

273-11: Allotment 218, Sandy Seeding, consists of a crested wheatgrass seeding located in the lower elevations in the southern portion of the allotment. The resource conflict/concern refers to areas in the northern portion of the allotment where native upland rangeland is located. Juniper is encroaching in these areas and, in time, would expand over larger areas if left untreated. Aspen is typically located along the rims in this portion of the resource area; however, it has not been observed in this allotment. The reference to aspen has been removed from the text.

273-12: The allotment management plan covers both the Hickey Individual (0202) and the Fisher Lake Allotments (0222). Objective 1 of the allotment management plan listed in Appendix E1 refers to both allotments. The reference to Camas Creek is specific to the Hickey Individual Allotment. Maps G-1 and G-2 in the Draft RMP/EIS, Volume 3, display allotments 0225, 0226, 0227, and 0228. These are not listed in Table 2-26 because the numbers were arbitrarily assigned when the ecological site inventory was being conducted. These allotment numbers were utilized for tracking the inventory data for isolated parcels of public land. These allotment numbers have been removed from the corrected Map G-3.

273-13: Land disposal was considered for many of these parcels. However, it is in the government's best interest to retain parcels that contain threatened and endangered species habitat, riparian areas, high value timber, or provide access to other public lands. It was determined that these Federal fenced rangelands do contain many of these values and, therefore, are not suitable for placement into land tenure zone 3 (disposal). These parcels could still be exchanged for other lands with similar or higher quality values.

273-14: The allotment direction mentioning Orijana Canyon is from another allotment and was mistakenly listed with this one. Bighorn sheep habitat does occur in this allotment, but it is not near the Orijana Canyon area. The text has been corrected.

Elk have greatly expanded their range over the past decade. Many of the AUM's listed for elk are for fall and wintering populations, although some areas have year-round resident elk. These AUM's were coordinated with the ODFW and feel they are valid. Also see response to comment 49-8.

273-15: In general, there are very few changes currently proposed to livestock grazing within the proposed ACEC's under the preferred Alternative D. Grazing use would continue to be managed according to permit stipulations. Changes in grazing use could be proposed in the future if monitoring reveals impacts on the relevant and important resources (Table 2-33) are occurring or if allotment evaluations or Standard and Guideline assessments reveal problems related to livestock grazing management. Such changes could include, but would not be limited to, fencing, reduction in livestock numbers, and changes in grazing season of use.

273-16: The amount of grazing use analyzed in Alternatives A–D in the Draft RMP/EIS was based on the average authorized use (over the last 10 years) rather than the full permitted use. This has been modified in Chapters 3 and 4 of the Proposed RMP/Final EIS. Refer to comment response 228-1.

RECEIVED
FFR 1 5 2007
LAKEVIEW, B.L.M.

Randy Drake
19210 Pinehurst Rd.
Bend, Or 97701

Att: Dwayne Sykes

Subject: loss of using and accessing public lands for recreation!

It is not easy to read through the draft books provided and say this is the alternative I favor. These three words Off-Highway Vehicle (all vehicles off the black top onto an existing road) is all that is being addressed. How about all the rest of us who want to access trails, primitive roads and paths off from the dirt roads???? From reading the literature inside of the three books there is no mention of horse camps and trails, staging areas and bike trails (motorized and nonmotorized), four wheel drive camping and trail systems, etc.... that can only be accessed from one of these back county dirt roads. I am in favor of a trail system accessing off from these old country roads. Trails that challenge the users and go around places that may need to be closed. I like seeing the very lands listed to be closed with a trail going close by or through them. How else can they be accessed by all the people.

Instead of closing lands find ways to keep them open to the majority of the users not a selected few.

There is no mention of an OHV park within the Lakeview District of BLM. Why not have one against Christmas Valley Sand Dunes; it sure would make since. Camping and restrooms and other trails could be access including the dunes. It would be very good business and allow some very organized groups to work with you.

Instead of closing more dunes why not fence around just the areas that are being exposed. In the rest of the world when fossils are found just the acres being dug in are closed off. Fence building in this area is very easy and as the acres become bare it could be expanded or deleted depending on if any thing is found worth protecting. Please don't close any of the dunes down. Let's work something out!!

Please keep all trails and primitive roads open that are left in the Steins Mountains on both sides of the mountains. I would hope paths through private properties could be obtained to allow access for all recreation users.

Remove all lands in wilderness study areas so they can be managed by the BLM for all recreational users. Managed lands are more valuable than wilderness as all the people can access them not a selected few.

Please rewrite those three books into one small one that allows access to all the lands by all the users. All use on public lands (by nonpaying users) is how us Americans Recreate. Therefore all lands should be open to all forms of recreation. OHV are used to access all of these lands by all the people as none are on the pavement...

274-1: Please see response to comments 10-1 and 185-2.

274-2: The LRA currently has no existing or proposed recreation sites (park areas) designed solely for intensive OHV recreation activities. Proposals would be considered on a case-by-case basis. To date, we have not received any proposals for consideration other than your suggestion for the Sand Dunes area. Most of the Sand Dunes WSA is currently designated open to OHV's and receives a great deal of use. However, it would be inappropriate to designate this area solely for this use because of its WSA status and sensitive resources in the vicinity (Fossil Lake).

274-3: This plan covers lands administered by the Lakeview District in southcentral Oregon and does not include the Steens Mountains. The Steens Mountain area is administered by the Burns District. Please direct your comment to that office.

274-4: Please see response to comment 269-4.

Thank you for allowing me to comment. I use these public lands in your district to hunt, fish, horseback ride, rock hounding, four wheeling, primitive camping and walking about. The hot springs are very nice after a long day of recreation.

Working with your office has been a pleasure over the past thirty years. I hope this will continue. No matter what project was done; it has made the public lands around Christmas Valley a better place to recreate.

Sincerely yours;

Randy Drake

Randy Drake



Phone 509.838.6912 Fax 509.838.5155 Email lc@landscouncil.org Website www.landscouncil.org
517 South Division Street
Spokane, WA 99202

RECEIVED
FEB 20 2002
LAKEVIEW, B.L.M.

Feb 13, 2002

Dwayne Sykes
BLM - Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630
Fax: (541) 947-6399

The Lands Council, Forest Conservation Council and National Forest Protection Alliance would like to provide public comments on the BLM Lakeview Resource Management Plan, a planning document that will guide the management of 3.2 million acres of federal lands over the next 20 years.

These lands - which span south-central Oregon and include Warner Wetlands, Lost Forest, Abert Lake, and Guano Creek adjacent to Hart Mountain National Antelope Refuge and provide vital habitat for sage grouse, redband trout, Warner suckers, California bighorn sheep, and pronghorn, and other key wildlife. Within this remote extension of the Great Basin lies some of Oregon's wildest roadless lands.

The bulk of the Lakeview Resource Area's 3.2 million high desert acres are wholly unsuited to cattle grazing or ORV use, yet the BLM's preferred management alternative does virtually nothing to change the status quo. In fact, the BLM recommends no change in current grazing levels or ORV usage for the next two decades.

1. We urge the BLM to reject Alternative D (the agency's preferred alternative; more information about Alternative D appears below) and instead choose a strengthened Alternative C that excludes livestock grazing and off-road vehicles from:

- + Proposed Wild and Scenic Rivers
- + Critical fish and wildlife habitat
- + Sage grouse leks (i.e., mating areas)
- + Areas of Critical Environmental Concern (ACECs)
- + Wilderness Study Areas (WSAs)
- + Grazing allotments in "fair" or "poor" condition



2. We believe that "adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines; without constant on-the-ground monitoring (a logistical impossibility within the understaffed BLM), adaptive management may only lead to further resource degradation.

3. We ask the BLM to take this once-in-twenty-years opportunity to update its wilderness recommendations for the Lakeview Resource Area (LRA). Five of the 14 Wilderness Study Areas found within the LRA were recommended by the BLM as non-suitable for wilderness in 1989. In each of these five cases, the rationale provided for a non-suitable recommendation was based on potential or planned projects - such as geothermal exploration, mineral development, intensive range projects, and powerline construction - that may or may not remain viable, or desirable, 15-20 years after Oregon's original wilderness inventory was conducted. The Lakeview RMP process is the most appropriate venue for reviewing and updating this information in an effort to determine if the BLM's current wilderness recommendations are still valid.

4. It is important that all Wilderness Study Areas, rivers, rock art sites, and cultural sites be identified and should receive a high level of protection.

Thank you for the opportunity to comment, please keep us apprised as to your next steps.

Sincerely, *Mike Peters*
Mike Petersen

—Tim on the Eastern Washington RAC—



Department of Energy

Bonneville Power Administration
3920 Columbia View Drive East
The Dalles, Oregon 97058

RECEIVED

FEB 27 2002

LAKEVIEW, B.L.M.

February 19, 2002

In reply refer to: Draft Lakeview RMP/EIS

Mr. Dwayne Sykes
Lakeview Resource Area
HC10, Box 337, 1300 South G. Street
Lakeview, OR 97630

Dear Mr. Sykes:

Thank you for the opportunity to comment on the Draft Lakeview Resource Management Plan/Environmental Impact Statement. Bonneville Power Administration (BPA) has reviewed Alternative D (Preferred Alternative) as it relates to existing and future electric transmission line rights-of-way, leases and permits. BPA's understands that Alternative D proposes to designate all existing transmission lines in the "Western Utilities Corridor Study" as rights-of-way corridors and establish a minimum standard corridor width of 2,000 feet. Additionally, Alternative D encourages applicants to co-locate electrical transmission lines greater than 69 kV, all mainline fiber optics facilities, and pipelines greater than 10 inches in diameter within these corridors to minimize environmental impacts and the proliferation of separate rights-of-way. The other management goals outlined in Alternative D as it relates to utility corridors provide reasonable direction and flexibility for future BPA transmission line planners and design engineers.

276-1

276-1: The 2,000 foot width would represent the maximum width of existing corridors over the life of the plan. New corridor widths could vary depending on the size of the project; however, that would be analyzed in a separate environmental assessment or environmental impact statement, which would address all aspects and impacts of such a project.

BPA understands the Preferred Alternative provides for some flexibility if co-location of new facilities are not compatible. Over the past several years, BPA has been reconsidering its policy to allow new industrial pipelines to locate adjacent to its transmission lines and facilities within its rights-of-ways. The recent catastrophic explosions and resulting destruction to surrounding property has raised serious concerns over the risks to critical BPA lines/facilities and transmission system reliability. Although no official policy has been adopted to date, BPA would like the opportunity to participate or provide input to the BLM whenever new pipelines are proposed within or adjacent to BPA transmission lines.

276-2

276-2: We will continue to keep the Bonneville Power Administration on our mailing list regarding the review of any future utility or major right-of-way proposals.

Once again, thank you for the opportunity to comment on your Plan/EIS. If you have any questions regarding this matter, please call me at 541-296-8905, ext. 170.

Sincerely,

Libby Johnson, Natural Resource Specialist



Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
Eastern Region
700 SE Emigrant
Suite 330
Pendleton, OR 97801
(541) 276-4063 Voice / TTY
FAX (541) 278-0168

February 22, 2002

LAKEVIEW, B.L.M.

FEB 25 2002

RECEIVED

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
1301 South G Street
Lakeview, Oregon 97630

RE: DEQ Comments on the *Draft Lakeview Resource Management Plan/Environmental Impact Statement, October 2001*

Dear Mr. Sykes:

The Oregon Department of Environmental Quality (DEQ) has reviewed the above referenced document with an emphasis on the protection of air, water, and land resources. The DEQ operates as a state delegated authority responsible for implementing the federal Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act among others, as well as implementation of Oregon environmental statutes and administrative regulations. The focus of our review is to ensure compliance with State and Federal laws and to promote ecosystem-based management. As such, we emphasize the importance of adaptive management, data collection and sound scientific assessment as an integral component of management, implementation of "best management practices" for resource protection, and performance monitoring using quantitative methods to ensure compliance.

The DEQ will not recommend a preferred alternative. We believe that the BLM's final Resource Management Plan should reflect the wishes of the public and the considered opinion of resource managers within the Lakeview District, once the public participation process is complete. The DEQ does expect, however, that the selected alternative comply with appropriate state and federal environmental laws and regulations. Those failing these essential criteria should be eliminated or modified for consideration as viable alternatives. Additionally, we expect that all management applications include measures to prevent degradation of waters (anti-degradation provisions of Oregon's Water Quality Standards) and restoration measures to attain compliance within a reasonable length of time. Toward that end, we believe the RMP and EIS is fundamentally sound as a mid-level planning document providing you consider the following detailed comments:

Page Comment

277-1

1-5 *Issue 3*, the DEQ encourages expansion of the essential planning questions to include: Which BMP's should be implemented to restore site potential (potential natural vegetation and geomorphic function) in watersheds with streams listed as water impaired under Section 303(d) of the Clean Water Act?

277-2

1-6 *Issues Eliminated from Detailed Study- Implementation and Effectiveness Monitoring*, the DEQ believes this issue is important to the success of the RMP process and should be included in the detailed analysis. The current approach is to bring forward the monitoring component as part of the RMP Record of Decision. We believe this is an error for reasons of accountability. It is important to recognize that effectiveness monitoring is the cornerstone of adaptive management. Therefore, by eliminating the public debate (visa-vie not divulging the monitoring program as part of the public input process) it undermines confidence there will be sufficient monitoring to assess progress toward meeting stated objectives and determine compliance.

277-3

The debate of monitoring methodology is not strictly a technical or budgetary issue. It is a reflection of public policy. The BLM may choose a more subjective qualitative monitoring method such as PFC over quantitative methods such as continuous temperature, geomorphic analysis, habitat etc. which becomes an issue of performance accountability. While PFC is an excellent planning and communication tool at the RMP level it is likely not suited for measuring compliance, or more importantly ecological status (site potential). As this process moves from a medium scale analysis at the RMP level to fine scale planning and implementation at the watershed level, the BLM will need to adjust its monitoring to include a well funded and carefully executed performance monitoring program using quantitative methods. We believe the Agency's approach to monitoring should be part of the debate.

277-4

1-7 *Relationship to Federal Agency Plans*, the BLM should include reference to "Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters, May 1999", and the Most Current and Inland Strategies for Managing Fish-Producing Watersheds ... (INFISH) if appropriate

277-5

1-11 *Relationship to State and Local Government Plans*, distinctly lacking from the discussion is Division 41, State-Wide Water Quality Management Plan: Beneficial Uses, Policies, Standards and Treatment Criteria for Oregon. Also, the BLM should reference the USFS/DEQ Memorandum of Agreement (12/05/2001) if the BLM is planning to be co-party to the agreement for implementing TMDLs on federal lands.

277-6

2-24 *Groundwater* discussion, we suggest the BLM provide further discussion of the important interaction between groundwater and surface waters and it management implications. Hypothetic flows provide an important role of sustaining base flow conditions during the low-flow summer period long after snow pack and precipitation have diminished. These

277-1: The suggested question has been added to Issue 3 in Chapter 1.

BMP's for management uses are found in Appendix D. In watersheds with streams listed as impaired under section 303(d), BMP's would be implemented and monitored (see also Appendix R). This would provide information on the streams to determine if they are at or near site potential and whether management actions are affecting their ability to meet site potential. The BMP's should move toward potential natural condition of vegetation, soils, and geomorphology.

277-2: A monitoring plan has been added to the Proposed RMP/Final EIS (see Appendix R). The public did have an opportunity to review portions of this monitoring plan (displayed throughout Chapter 3 of the Draft RMP/EIS) and the plan in its entirety during the public review of the Proposed RMP/Final EIS, prior to the approved RMP/ROD.

As site-specific watershed restoration plans are developed for waters listed as impaired under section 303(d), the BLM would develop a monitoring strategy that would be included in the water quality management plan. For other waters in the planning area, primarily ephemeral or intermittent streams, the BLM would implement BMP's.

277-3: Refer to comment responses 226-2, 257-5, 257-15, 257-17, 257-24, and 257-25.

277-4: This reference to the "Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters" has been added to Appendix B, Table B-1. INFISH does not apply to the Lakeview District, BLM.

277-5: The "State-Wide Water Quality Management Plan: Beneficial Uses, Policies, Standards and Treatment Criteria for Oregon" has been included in Appendix B, Table B-1. The BLM should soon have a signed memorandum of agreement for implementing total maximum daily loads on Federal lands.

277-6: A section on groundwater and the relationship to surface water has been added to Appendix F4.

interactions are particularly important in small desert streams which heightens the importance of managing ground water.

277-7

Management Activities discussion. The DEQ does not agree with the statement "Even under pristine conditions, State standards for temperature would be unlikely to be achieved on BLM stream reaches". This statement reflects a common misunderstanding of Oregon's stream temperature standard. The temperature standard is much more than just numeric temperature criteria. Basically, the standard states that, when specific numeric criteria are exceeded or when certain conditions apply, there shall be no measurable increase in stream temperature due to human causes. If human activities are controlled, as one would assume they would be if conditions are pristine, then the standard would be met even if criteria are not met. Studies are needed at the subbasin scale to determine the thermal potential of the area given natural variability between basins across Oregon. This should then allow one to identify human impacts so that they can be addressed or mitigated.

Comments regarding *Air Quality and Management of Air Resources*

The Lakeview Resources Management Plan and Environmental Impact Statement generally addresses air quality resource concerns reasonably well. We are pleased that the document identifies all requirements necessary to fulfill the Resource Management Area's legal obligations to protect air quality under the current federal and state rules regarding smoke management. In particular, we are pleased the National Ambient Air Quality Standards requirements will be met. To accomplish these tasks the plan states the Lakeview Resource Management Area will take direction from the South Central Oregon Fire Management Partnership to protect public health and the environment. In addition, there is recognition of the "Oregon Smoke Management Plan" and a description of the voluntary approach to be implemented in the Lakeview Resource Management Area.

We appreciate that the plan attempts to describe acreage burned and particulate 10 microns and less in size (PM10) amounts in tons per year. We are encouraged by the Resource Areas commitment to aggressive mop-up and cutting off or limiting new burning based upon smoke accumulations and predictive dispersal forecasting. In addition, aircraft will be used to track emissions for long distance transport of smoke.

277-8

Some inaccurate statements or inconsistent statements were made in the document, however. In the introduction and again in Chapter 3, it states that there is one monitoring station in Lakeview that only monitors in the wintertime. While it is true that Lakeview's nephelometer only measures light scattering in the winter, it is not true that we only monitor PM10 and PM2.5 in the winter. During the summer months monitoring is scaled back to monitoring one in every six days whereas the winter months monitoring is conducted daily for PM2.5. Winter monitoring of PM10 varies from 1 in 3 to 1 in 6 days. In addition, I believe there is a typo in either the introduction or Chapter 3. For the

277-7: The text in question has been changed. The BLM is currently working with ODEQ to assemble information necessary for total maximum daily load development that assesses the natural potential condition of streams and riparian areas including vegetation and geomorphic condition. Furthermore, the riparian score card method provides an assessment of both current and potential vegetation and soils. These analyses would provide the background and information necessary to understand thermal potential, as well as natural potential condition of other riparian resources. Additionally these analyses would allow the BLM to assess the effects of management, such as anthropogenic increases in stream temperature on streams and riparian resources.

277-8: The statement that there is only one air quality monitoring station in Lakeview that only monitors in the wintertime was changed in the Proposed Final RMP/EIS.

The acreage inconsistencies have been corrected.

introduction, acreage prescribe burned is 640,000 acres in Alternative "C" and in two locations in chapter 3 it is 64,000 acres. I believe 640,000 acres is correct based on the management assumptions you make for the alternatives.

Certainly, alternative "A", the no action alternative, is the DEQ preferable alternatives when comparing smoke impacts. Alternative "A" currently treats 5 to 20,000 acres per year with prescribed fire. While we understand the need to improve degraded ecosystems, "A" provides the best protection for air resources. If alternative C is really up to 640,000 acres per year, alternative "C" provides the worst protection for air resources. Given all the objectives of the Lakeview Resource Area, alternative "D" as described is the BLM's preferred alternative. Alternative "D" states that up to 480,000 acres per year will be treated with prescribed fire. If this alternative is selected, an aggressive smoke management program will be necessary to manage smoke as a priority for the Resource Management Area.

To meet the objective of 480,000 acres in Alternative "D" we assume helicopter ignition of large landscapes will be planned. Our observation of helicopter ignitions is one of significant ground level smoke over a large area. Control of this smoke may be difficult.

Please make a thorough analysis of how smoke impacts in populated areas will be avoided. Large prescribed burns or prescribed burns that may impact populated areas should be modeled to help lay the framework for the prescription. Intrusions of smoke in populated areas occur even during the best-planned projects and there should be monitoring and an evaluation of the effectiveness of the burn program and what actions will be taken to avoid impacts in the future. The plan should recognize that in Oregon; La Grande, Klamath Falls and Lakeview are nonattainment areas for particulate matter and as such efforts must be made to prevent smoke intrusions into these areas. Additionally, it should recognize smoke sensitive persons living in rural areas and plan to address remote area smoke-impacts to rural populations. Smoke management should be integrated into fire management and be an active mechanism in the planning, monitoring and evaluation process.

There was no mention of the South Central Oregon Fire Management Partnership documentation of policy or management techniques to aggressively manage smoke as stated in the Management Goal. While it is a fine goal to meet the National Ambient Air Quality Standards, (NAAQS), other goals of human health for sensitive people should also be recognized. Regarding Chapter 4, the assumptions that the NAAQS will not change or that the Oregon Smoke Management Plan will not change may be naive. Both the NAAQS and the Oregon Smoke Management Plan is required to be updated every five years. The Oregon Smoke Management Plan is due to be updated in the very near future. EPA is studying health impacts of particulate matter currently to begin an update of the particulate matter NAAQS in a year or two from now. Both could change and the Resource Management Area will need to update their strategies to conform.

277-9

277-9: In the past, the BLM analyzed the smoke impact to downwind communities, special protection zones, and nonattainment areas during the planning process for prescribed burns. The BLM has conducted prescribed fire operations when wind directions have been favorable for moving smoke away from these sensitive areas and when transport winds have been favorable for lofting of smoke to achieve good mixing heights.

In future prescribed fire planning, the BLM would analyze smoke impact to communities or other special consideration areas if the proposed project is likely to contribute smoke into these areas. The Simple Approach Smoke Estimation Model would be used as a screening tool to analyze air quality impacts of these prescribed burning projects. The model analyzes total suspended particulate concentration and reduction in visual range due to smoke. The model provides results as follows:

- a) The maximum concentration and distance from the fire at which particulates would occur.
- b) An indicator of whether an ambient concentration standard would be exceeded in the vicinity of the fire and over what range of distance from the fire this level of impact could be expected.
- c) Two estimates of the minimum visual range which would be expected.

277-10

277-11

Dust generated from public lands can be significant, especially when lack of ground cover and high winds occur together. Summer Lake and Silver Lake in particular are susceptible to windblown dust. Residents at the north end of Summer Lake complain about dust impacts from the lake. Some smaller dust-particles can be suspended and transported long distances. The BLM may want to monitor dust impacts from these areas. EPA's Natural Events Policy addresses high wind speed events. The remedy for these events is to institute best management practices on the land to prevent or mitigate the events. There was no discussion of the Natural Events Policy in this plan.

277-12

2-97 *Hazardous Materials.* This section should develop CERCLA-related requirements and issues on public lands within the Lakeview BLM District. Specifically, the DEQ has serious concerns about the environmental releases on abandoned mine lands, cleanup status of historical or active mercury mines, and possible acid mine runoff.

277-13

3-13 *Riparian/Wetland Vegetation, Management Goal-Restore, maintain, or improve riparian vegetation, habitat diversity, and associated watershed function to achieve healthy and productive riparian areas and wetlands.* This section should be refined to reflect the need to manage riparian ecosystems to attain vegetative and geomorphic site potential. "Site potential" or natural vegetative potential and geomorphic potential is likely to be the target of the temperature TMDL and for water quality restoration plans on federal lands. Also, these are the benchmarks for preventing future listings on BLM lands. Therefore, they should not be left out when evaluating alternatives for selection as the RMP.

277-14

3-17 *WaterResources/Watershed Health, Management Goal2-Ensure that surface water and ground water influenced by BLM activities comply with....* The DEQ recommends this section be expanded to include language to address management activities to prevent degradation of surface waters (Antidegradation Policy for Surface Waters 340-41-026(1)(a) Oregon administrative rules), and develop Water Quality Restoration Plans (WQRPs) to implement TMDLs on Section 303(d) listed streams.

General Comments regarding the discussion of *Management Alternatives and the Environmental Consequences:*

277-15

- The discussion of alternatives in the above sections should include progress toward meeting site potential vegetation and geomorphic equilibrium or, in other words site potential ecological status. While DEQ has recognized the importance of PFC as a tool or indicator of overall trend-PFC status is not the ultimate goal for DEQ or BLM- it is ecological status. Therefore, comparison of alternatives should address site potential ecological status as a central organizing principle common to all and discussed accordingly. Site potential can be quantified using current scientific and monitoring methods and is a language that is common to both DEQ and the BLM as the ultimate goal;
- The discussion of alternatives in the above sections should include measures to prevent degradation of water quality and healthy riparian areas. The BLM has taken a responsible

The BLM has made every reasonable effort to minimize smoke impacts to individuals living in outlying areas, especially if it is known before conducting the proposed project that these individuals are smoke-sensitive or have documented health issues related to smoke. This is achieved when adjacent land owners and residents are contacted as the fire planning is conducted and before ignition. The BLM would continue to monitor for individuals that are in this category in the future.

277-10: The South Central Oregon Fire Management Partnership is a group that was voluntarily formed in 1995 by a memorandum of understanding to help alleviate the PM10 smoke problem from residential wood stoves in Lakeview. The organization's objective states, "This MOU recognizes that Lakeview has a PM10 smoke problem from residential wood stoves. This MOU demonstrates and provides for the forestry community in taking responsibility for smoke from prescribed burning not to contribute to Lakeview's PM10 problem. Therefore, this MOU will provide a voluntary smoke management program in the Klamath-Lake District and specifically those areas within Lake County which have the greatest potential of impairing the air quality of the Lakeview Non-Attainment Area." Management techniques and procedures are discussed in the memorandum of understanding, which is on record in the Lakeview Interagency Office.

The BLM recognizes that the "National Ambient Air Quality Standards" and the "Oregon Smoke Management Plan" may change in the future. The assumption that they would not change was for analytical purposes only to compare the impacts of the various alternatives: If either set of standards change in the future, they can be incorporated into the plan through plan maintenance procedures.

277-11: The dust problems described in the vicinity of Summer and Silver Lake are due primarily to large expanses of exposed, unvegetated playa lake bottom or adjacent sand dunes containing loose alkaline or sandy soils. Dust is controlled mainly by climate and fluctuating lake levels. There is no conceivable management action that the BLM could take to help prevent these problems. The BLM has no responsibility to monitor these air quality problems.

277-12: The LRA would continue to manage its hazardous material program in full compliance with Federal and state laws and regulations. The BLM has conducted an abandoned mine land inventory in recent years. Those sites with known problems have largely been addressed. If you are aware of specific sites with problems that have not been addressed, please let us know. Otherwise, your concern appears unfounded. The BLM would continue to monitor public lands to safeguard human health, prevent environmental damage, and limit future liability.

277-16

position toward implementing TMDLs as part of this plan, which is a focus toward restoration. What is lacking is the clear development of the concept of prevention. Oregon's administrative rules for water quality provide a clear expectation that degradation of the state's waters should not occur as a result of anthropogenic activities which may be equally, if not more, important than cleaning up streams. As an example, the concept of designating and protecting Cold Water Areas within streams systems undergoing passive and/or active restoration is an important riparian management concept (i.e. preserve the best and restore the rest). By recognizing cold water refugia within a stream and managing to preserve those areas an anchor is created that protects the beneficial uses while the remainder of the system is in recovery. This element should be a common denominator and a point of discussion in each step of the process. More importantly, we encourage that the BLM incorporate the concept of cold water refugia into the assessment protocols for the *Riparian Area Conservation Delineation Process*; and

277-17

- We encourage a more in-depth discussion of the ecological concepts and management implications related to groundwater and flood plain function. The BLM should emphasize the importance of restoring hyporheic flows in the riparian zone (base flows, thermal refugia etc.), and the value of managing toward a stable geomorphic state with a focus on rebuilding disjunct flood plains and re-establishing flood plain functions (Rosen flood prone area) in entrenched systems and providing efficient competent sediment delivery. These are important aspects to achieving site potential ecological status and should be more prominent in the discussion.

Thank you for the opportunity to comment on the RMP and EIS for the Lakeview District. If you have specific questions regarding DEQ comments, please contact Bruce Hammon at 541-388-6146 x 255 for riparian and water-related issues, or Larry Calkins at 541-388-6146 x 245 for air quality issues.

Sincerely,

Joel Hammond

Joel Hammond
Administrator
Eastern Region

Cc: Dick Nichols, Peter Brewer, Brett McKnight, Mike Renz, Don Bramhall, Bruce Hammon, Larry Calkins, ODEQ Bend
Terry Hosaka, ODEQ The Dalles

277-13: Please see responses to comments 226-2, 257-5, 257-15, 257-17, 257-24, and 257-25.

277-14: The BLM would continue to implement the 303(d) Protocol for waters included on the State's 303(d) list of affected waters. The Protocol provides a framework for planning and implementing water quality protection and restoration objectives. The BLM would develop water quality restoration plans that include protective and restorative measures to achieve and ensure compliance with State water quality standards. However, the ultimate goal is not simply compliance with State standards. At present, adoption of water quality standards does not require an assessment of the inherent capabilities and limitations of ecosystems or the dominant interactive and synergistic processes that drive watershed function. The BLM strategy to use the riparian score card method to better define, implement, and monitor BMP's and appropriate protective, restorative, and/or mitigative measures should get us to the point where we can manage to site potential. The water quality restoration plans would outline this strategy, including a timeline and funding sources for restoration.

The BLM believes that this approach is consistent with and supports the State's anti-degradation policy. BLM understands the intent of the policy to protect water from unnecessary degradation from point and nonpoint sources of pollution, as well as to maintain and/or enhance water quality to protect all existing beneficial uses. Through an assessment of site-specific conditions, best treatment technologies, and management practices for implementation can be developed. Then, through water quality restoration plans and companion total maximum daily loads, the goals of ensuring long-term sustainability of a healthy productive landscape can be pursued.

277-15: Please see responses to comments 226-2, 257-5, 257-15, 257-17, 257-24, and 257-25.

277-16: Refer to comment response 277-14. The water quality restoration plans would provide the details necessary to pursue the goals of ensuring long-term sustainability of healthy productive landscapes including, but not limited to, cold water refugia, as well as the terms and conditions of existing biological opinions. An approach that emphasizes cold water refugia and does not give equal weight to other refugia is narrow and could limit BLM implementation of land use/management plans developed according to existing policy.

277-17: Please see response to comment 277-6.

L-277

RECEIVED
MAR - 6 2002
LAKEVIEW, B.I.M.
Dear Scott:

Chen Post
95180 State Drive
Lakeview, Oregon 97630

I appreciated receiving a copy of the Lakeview Resource Area Draft Resource Management Plan. However, I didn't have enough time to comment before the deadline date. That was my fault!

Please send me a copy of the Final Resource Plan when it becomes available. I am very interested in the management of the Lakeview Resource Area.

Thanks!

Alan King



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

LAKEVIEW, BLM.

February 28, 2002

Reply to
Attn Of:

ECO-088

RECEIVED
MAR 17 2002
REF: 99-041-B

Dewayne Sykes, RMP Team Leader
BLM
HC 10, Box 337
Lakeview, OR 97630

Dear Mr. Sykes:

The Environmental Protection Agency (EPA) has reviewed the **Draft Lakeview Resource Management Plan (RMP)** Environmental Impact Statement (EIS) according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

This draft incorporates management activities in the 3.2- million acre Lakeview Resource Area into one management plan in southeastern Oregon. Of five alternatives considered, D is the BLM's preferred alternative. It proposes to improve the environment while allowing mining, grazing, food production, recreation, and timber harvesting. A recreation designation under the Wild and Scenic River Act is proposed for a 6.6-mile portion of Twelvemile Creek.

279-1a

Based on our review, we have rated this EIS EC-2 (Environmental Concerns-Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we have used in conducting our review of the draft EIS is enclosed for your reference. While the management plan provides a lot of historical detail of the area, the draft EIS does not provide enough specifics on what will be done under Alternative D. Our major concerns with the plan include lack of information on noxious weeds, water quality, protection of tribal interests, air quality and roads. We recommend that these issues be addressed in the final EIS.

Management of Geothermal Energy Resources

According to the EIS, anticipated energy shortages in the Pacific Northwest and the focus on global warming, clean geothermal energy resources in the Lakeview Resource Area could become more important in the future. The EIS states (Page 2-84) that most of the planning area has potential for geothermal energy, indicated by high heat flow. In addition, the Summer Lake/Paisley, south Warner Valley and Lakeview areas contain hot springs and hot wells. Currently, geothermal energy is used only on private land for heating homes and greenhouses in the Lakeview area and for mineral baths in the Summer Lake area.

279-1a: A resource management plan is a broad land use plan and associated EIS. As stated in the planning handbook (USDI-BLM 2000g), land use plans "... guide management actions on public lands ... establish goals and objectives for resource management, the measures needed to achieve these goals and objectives, and parameters for using BLM lands ... Land use plan decisions ordinarily are made on a broad scale and customarily guide subsequent site-specific implementation decisions." By this definition, the Draft RMP/EIS and Proposed RMP/Final EIS do, in fact, contain enough specifics for the preferred Alternative D related to noxious weeds, water quality, Tribal interests, air quality, roads, and other resources.

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279-1b

The RMP should be revised to include the management strategy that would be employed to comply with the Geothermal Steam Act of 1970, including the 1988 amendments. The RMP should also be revised to clearly identify the specific measures that the BLM intends to employ to mitigate any environmental effects from developing this resource, such as noise, odors, thermal pollution, and discharge of dissolved materials into surface or ground waters.

Noxious Weeds/Juniper Management

Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem, such as road building or other land disturbance activities.

We are pleased that the BLM is taking action to control the spread of weeds with activities such as an education and outreach program, developing and implementing a weed management program in the Abert Weed Management Planning area, removing livestock from at risk or non-functioning streams, and limiting off road vehicle use to designated roads and trails in the North Lake wildlife area.

279-2

However, some activities seem to contradict these proactive measures and should be more fully explained in the final EIS. Specifically, we recommend that the final EIS include a discussion and analysis of the proposal to increase by 41 percent in Animal Unit Months (AUMs) for wild horses in the Paisley Desert area that would cause more disturbance to soil and vegetation, and create the potential for weed invasion and establishment.

Plant seeds can also be carried from a source area by the wind, wildlife or pack animals, on equipment tires and tracks, and on the boots of hikers. Care should be taken to implement control procedures in all source areas to avoid spread to unaffected areas. EPA recommends that the RMP include the following measures to control the spread of noxious weeds:

- Work with the nearby Fremont National Forest to reduce and control sources of weed seed from that area. With the exception of the Silver Lake Ranger District, Fremont National Forest does not have a comprehensive, ongoing weed management program. The forest would continue to be a source of weed infestation, since the headwaters of many of the streams on the Lakeview planning area are in the forest. Weed seeds would continue to flow down onto BLM lands.
- Ensure that equipment trucks and tires are cleaned prior to transportation to an uninfested site.
- Focus control efforts at trail heads and transportation corridors to prevent tracking of seed into uninfested areas.
- Attempt to control the spread from one watershed to another to reduce water as a transport vector.

279-1b: The environmental requirements for conducting exploration operations are found at 43 CFR 3252.11, while requirements pertaining to utilization are listed at 43 CFR 3275.12 and 3275.14. The management strategy would be dependent on site-specific information. Mitigation measures would be specific to a future proposal. These things are described in detail in a site- or proposal-specific environmental assessment or an environmental impact statement. It is inappropriate to identify specific measures when there is no specific proposal to consider. Refer also to comment response 279-1a. The BLM complies with the “Geothermal Steam Act” of 1970, as amended, and the appropriate “Code of Federal Regulations.”

279-2: The text has been clarified to show that the increase in AUM’s for wild horses represents a more accurate representation of the amount of forage currently consumed by wild horses than the number presented in previous planning documents. The current situation, Alternative A, represents forage for 85 horses for 12 months in the Paisley Desert Herd Management Area. At the same time, the herd management area is managed for 60–110 horses. Consistent with other RMP’s within the State, the recommendation for forage allocation in Alternatives B–E is 12 months of forage for horses at the top of the appropriate management level. The recommendation in Alternative D is to increase the time between gathers in Paisley Desert by 1 year, and to increase the top appropriate management level to 150 horses. By definition, appropriate management level is the optimum number of wild horses that protects the range from deterioration. The proposed increase is supported by monitoring data, and would not cause significant negative impacts to soil and vegetation or increase the potential for weed invasions within the herd management area.

279-3: Since the Draft RMP/EIS was published, the Fremont National Forest has made strides toward implementing a comprehensive ongoing weed management program. It is true that some Ranger Districts are more proactive

- If a localized infestation exists and control is not a viable option, consider rerouting trails or roads around the infestation to reduce available vectors for spread.
- Reseed disturbed site as soon as possible following disturbance.

279-4

We recommend that revegetation (reseeding with native grass mix) be expanded to seed any site within the control area where the vegetation density is low enough to allow reinfestation or introduction of other noxious weeds or erosion. The goal of the seeding program should be to (re)establish the sustainability of the area.

The EIS indicates that lack of fire over the past century has enabled juniper stands to encroach on areas occupied by shrub steppe. A total of 150,000 acres would be treated in order to restore grass and shrubs. It is not clear, based on the general discussion of management objectives, how juniper will be treated. We recommend:

279-5

- An evaluation of the ecological impacts of removing juniper. The draft EIS presents little discussion of the plant and animal communities occupying current juniper woodlands, or the impacts of those communities occupying current juniper woodlands, or the impacts to those communities with the proposed treatments presented in the plan.
- It appears that juniper treatment would result in increased rangeland within the planning area. The EIS should discuss increased grazing and its associated environmental impacts.
- The EIS should provide a clear definition of what an old growth juniper woodland is composed of, along with a map showing the locations of the old growth woodlands found within the planning area.

303(d) Streams

Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon to identify water bodies which currently or potentially fail to meet state water quality standards, (this is commonly called the CWA 303(d) list), and to develop a load limit or TMDL for each stream and pollutant on the 303(d) list of impaired water bodies.

279-6

Table 2-17 lists several water quality impaired streams, all listed on the 303(d) list for temperature by the Oregon Department of Environmental Quality (DEQ). These water bodies are located in the Summer Lake, Lake Abert, Warner Lakes and Goose Lake sub basins. BLM should use the framework provided in the *Forest Service and Bureau of Land Management Protocol for Addressing 303(d) Listed Waters* to demonstrate that proposed alternatives 1) would not worsen water quality in the short-term and 2) are part of an explicit long-term strategy to improve water quality as required by NEPA (40 CFR 1500.2(c)) for these listed streams. The BLM and the Forest Service signed the Protocol and implemented it starting in May, 1999.

The Protocol directs managers and staff to 1) validate that listed streams are impaired, 2) demonstrate that sufficiently stringent management measures are preventing additional degradation, and 3) use Water Quality Restoration Plans (WQRPS) or other mechanisms (such as standards) to improve water quality over the long-term. In short, the Protocol addresses 303(d)

than others, but the BLM cooperates with the USFS to the fullest extent possible in weed inventory work and contracting for weed control work. The Warner Mountains portion of the Lakeview Ranger District is within the Warner Basin Weed Management Area (see Noxious Weed section, Chapter 2). One objective of this weed management area is to control weeds at the top of the watershed (on Forest Service lands) to reduce the potential for weed seed to travel downstream onto BLM-administered and private lands. The BLM is monitoring the Warner Mountains portion of the Lakeview Ranger District for new and existing infestations and effectiveness of weed control measures.

Although specific actions taken to control the spread of noxious weeds are not explained in great detail, Chapter 4 describes mitigation measures for a variety of activities that contribute to the spread of weeds. Rerouting roads to avoid weed infestations is suggested as a mitigation measure under Alternative A. Restoration of disturbed sites is a key element in each management goal under the Plant Communities section in Chapter 3. Revegetation of weed control sites was included under the management goals of Plant Communities and need not be addressed separately under the Noxious Weeds section.

279-4: Whether or not to reseed a disturbed area is determined on a case-by-case basis. In some areas, the vegetation density is naturally very low and weed invasion has not been observed. In areas where native vegetation density is low due to the long-term occupancy of the site by weeds, active revegetation actions would occur after control of the weed population(s). To state that we would seed any site where vegetation density is low is not consistent with the goal of restoring and maintaining the diversity and distribution of desirable vegetation communities stated in Chapter 3.

Assessments of erosion potential would be conducted on a case-by-case basis. Soil characteristics, including, but not limited to, soil type, amount of coarse fragments, and slope, would be assessed to determine if the rate of erosion could exceed the natural rate. That assessment would recommend seeding, if appropriate.

listed streams by examining the problem from a watershed perspective and developing a strategy for improving the quality of the impaired stream.

279-6

The final EIS should explain the purpose and intent of the 303(d) Protocol, what it calls for land managers to do, and how or if the 303(d) Protocol will be applied to project-specific activities developed pursuant to the RMP. If the Protocol is not to be applied, the final EIS should explain why not.

Endangered Species Act

279-7

The EIS lists a number of species that are threatened or candidates for listing under the Endangered Species Act (ESA). The ESA requires the BLM to consult with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS), or both in cases where proposed projects could potentially impact species or critical habitat. Resulting biological assessments and opinions should be developed and their results summarized and disclosed in the final EIS (40 CFR 1502.25 (a)). By doing this, the EIS would demonstrate that ESA procedures are being followed and that listed species and their habitats are being protected.

Tribes

According to the EIS, five tribal governments, whose ancestors have lived in the area for thousands of years, have an interest in the Lakeview Resource Management area. These tribes are the Klamath Tribes, the Confederated Tribes of the Warm Springs Reservation, Burns Paiute Tribe, Fort McDermitt Tribe, and the Fort Bidwell Tribe. We are pleased that BLM has met with the tribes to identify tribal goals, needs or plans.

279-8

The EIS indicates that cultural resource sites will be designated as Areas of Critical Environmental Concern (ACEC) and will prescribe special management. To ensure that these sites will be adequately protected, the final EIS needs to provide detailed information on how these areas will be managed. The EIS lists several concerns for these sites: theft, vandalism, area tours encouraged by local businesses, and competing uses for plants. Under preferred Alternative D (IV-107), large parts of the planning area are open to off-road vehicles, which have the greatest impact on cultural resources important to the tribes. The EIS states that trails are created by off-road vehicles that cut and erode sites, scatter and break artifacts, and the noise level and presence of people can impact use of tribal sites. We recommend that the RMP be revised to include the management prescriptions to be applied to protect cultural resource sites, consistent with direction to include and identify mitigation measures in the EIS (40 CFR 1502.14).

Wildland/Prescribed Fire and Air Quality

279-9

The final EIS should be revised to incorporate the direction contained in EPA's *Interim Air Quality Policy on Wildland and Prescribed Fires*, issued in May, 1998. This policy, developed in conjunction with the U.S. Department of the Interior and other affected stakeholders, is intended to address the two public policy goals of 1) allowing fire to function in

279-5: For the purposes of this plan, old growth juniper is defined as trees that established before 1870. The first significant European settlement of the planning area began in the 1870s. Livestock grazing and fire suppression began to alter the landscape after that point in time. Juniper woodlands established prior to 1870 existed under more natural fire regimes and tended to be located in more fire resistant locations, such as rocky, dry sites with low fuel levels. Refer also to Forest and Woodlands, Management Goal 2 section of Chapter 3.

The goals for reducing the amount of western juniper on the LRA were developed for a variety of reasons, including rangeland health and wildlife values. Much of the wildlife concern focuses on wildlife habitats for sensitive and locally important species that are changing due to juniper expansion. As a result, less habitat is available for these species. These projects would be intended to improve ecosystem health, not produce additional livestock forage. Although specific treatments and impacts are not described or analyzed in the plan, detailed site-specific analysis and public input would occur when these individual projects are planned on the ground. Also see response to comment 279-1a.

279-6: The BLM is implementing the Protocol for 303(d) listed waters. The LRA is following the decision framework outlined therein, but would answer more than one question at a time. The validation and assessment question would be answered at the same time with the same basic information. The question is not if a given stream meets the numeric criteria, but is BLM management is causing a change in stream temperature. The listing of the 303(d) streams have not been validated, and current determinations of no effect from BLM management rely on literature and implementation monitoring.

Because the RMP is a large-scale analysis, not all reach-specific questions can be answered. The BLM is currently working with ODEQ to assess the potential natural condition of the stream morphology, riparian soils and vegetation, and stream water temperature. We will first determine what the current reach condition is by using the riparian score card method, which describes the riparian ecological type, ecological condition, and relationship to potential natural communities. This includes assessment of soil conditions and other physical characteristics. There would be geomorphic and habitat inventories along with implementation monitoring of management in riparian habitat conservation areas.

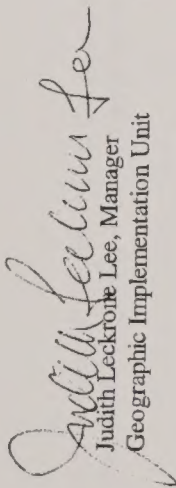
its role in maintaining healthy ecosystems and 2) protecting public health and welfare by mitigating impacts from air pollution emissions.

Roads

Transportation planning and direction should be included in the management plan, along with an evaluation of the anticipated consequences. About 20 miles of new roads would be added to the 350 miles of existing roads. According to the EIS, new roads could open parts of the planning area that currently do not have any access. Roads are significant contributors to the degradation of the ecosystem and result in negative effects on hydrology, sediment delivery to streams, habitat fragmentation, water quality and aquatic habitat, biodiversity, and predation. The RMP should include maps showing where new roads will be located and where roads will be closed. The EIS should also evaluate the likely effects of potential management activities (e.g. mining, oil/gas exploration) that would result from improved access through the development of new roads.

Thank you for the opportunity to comment on this draft. If you have any questions, please contact Val Varney at (206) 553-1901.

Sincerely,


Judith Leckrode Lee, Manager
Geographic Implementation Unit

Enclosure

Monitoring includes (see Appendix R):

- 1) Stream geomorphology;
- 2) Fish habitat;
- 3) Stream temperature;
- 4) BMP monitoring;
- 5) Photographic monitoring;
- 6) Grazing monitoring; and
- 7) Long-term monitoring and report as required in the biological opinion.

The monitoring is designed to identify if BLM management is affecting water quality and the specific known problems.

The BLM has not determined that the listed streams are not in compliance with the Oregon State water quality standards and is working with ODEQ to make that determination. When the total maximum daily loads are developed, the BLM would work with ODEQ to develop detailed water quality restoration plans that meet the total maximum daily loads.

Please refer to Chapter 2, Water Quality Impaired Stream Reaches section, for the discussion on USFS and BLM protocol for addressing 303(d) listed waters. Project-specific analysis would be conducted assessing proposed project effects on water quality.

279-7: Please see response to comment 228-25.

279-8: The general management prescriptions for these areas are included in the Special Management Areas and Cultural and Paleontological Resource sections of Chapter 3. If it is determined that more specific management direction is needed, this would be done through the preparation of an activity plan, such as an ACEC or cultural resource management plan, in accordance with BLM planning guidance (USDI-BLM 2000g). Refer also to comment response 279-1a.

279-9: The Proposed RMP/Final EIS addresses EPA's two public policy goals relating to air quality and prescribed fire: (1) allowing fire to function in its role in maintaining the health of ecosystems, and (2) protecting public health and welfare by mitigating impacts from air pollution emissions. Fire Management Goal 3 addresses EPA's first public policy goal. It states, "Restore and maintain ecosystems consistent with land uses and historic fire regimes through wildland fire use and prescribed fire. Reduce areas of high fuel loading resulting from years of fire suppression that may contribute to extreme fire behavior." The Air Quality Goal addresses EPA's second public policy goal. It states, "Meet the national ambient air quality standards as described in the 'Clean Air Act' and follow the direction and requirements of the Southcentral Oregon Fire Management Partnership."

279-10: There are approximately 2,500 miles of roads mapped on the transportation plan (USDI-BLM 2000e). These roads are officially part of the transportation plan, and are maintained periodically, depending on annual funding. Another estimated 2,500 miles of vehicle trails exist in the resource area, which are not on the transportation plan and are not maintained. The 20 miles of new roads are an estimate for analysis purposes of what may be added over the life of the plan barring development of any major project such as an electrical generating facility, an electrical transmission line or pipeline, or a mine. The impacts of any new roads constructed would be analyzed in a site-specific NEPA document prior to construction. Wherever possible, existing roads would be used. It is recognized that roads can have a negative impact on some components of the ecosystem. These impacts vary due to location, precipitation, slope, soil types, maintenance levels, and other factors. However, these impacts on up to 20 miles of new road construction would be more than offset by the closure of several hundred miles of roads and trails elsewhere in the planning area (See Table 4-4 and Maps SMA-5 to SMA-32).

RECEIVED

MAR 11 1992

Laird Ranch
W.C. Laird - permittee
PO Box 13
Plush, OR 97637

Dwayne Sykes
RMP Team Leader
Bureau of Land Management
HC 10 Box 337
Lakeview, OR 97630

RE: Comments on the Lakeview Draft RMP/EIS

Dear Mr. Sykes:

Please enter the following comments for the Lakeview Draft RMP/EIS. There are many issues dealt with in the Draft plan and although I have problems with many of the assumptions and conclusions I would like to comment on the most pertinent and reserve the right to comment again on the amended Plan in the future.

280-1

280-1: Please see response to comments 273-16 and 228-1.

Grazing Animal Unit Months (AUMs)

There is a huge discrepancy in the allotted aums under all the alternatives. On page 2-38 of the plan the total active preference is listed at **164,128 aums**. These are the aums in the alternatives listed on S-6:

Alternative A	108,234
B	119,057
C	86,587
D	108,234
E	No grazing authorized

The averaging method for the past ten years should not be a benchmark for the starting base of available aums. The active preference should be the benchmark. Using the **108,234** which is in **A and D** is an actual cut of **55,894 or 34%**. Alternative A is supposed to be no change in management. In **Alternative B**, which is supposed to emphasize commodity production, there is a cut of **45,071 or 27.5%**. Are the cuts across the board for all permits or just targeted permits? Is it legal to start with a new benchmark instead of the active preference that can be authorized today? These are just a few of many questions, which should be asked on the AUM issue.

Noxious Weeds

280-2

Although noxious weeds are an increasing problem throughout the LRA, I would just like to focus on the Warner Basin. In A-13, the ICBEMP listed Mediterranean sage and medusahead as the ecological threats. This leads me to question whether they even did an on site visit to the basin. Perennial pepperweed, and Canadian thistle have nearly taken over the Warner Wetlands at Hart Bar and this seed source stands to threaten the ecological integrity of the entire north Warner Valley and the surrounding private land. Even though there is a court injunction against the most desirable chemical to control pepperweed (which should be fought by the Lakeview district until it is overturned) the agency could still use 2,4-D or other chemicals to at least control the seed source. Under no alternatives are there any real aggressive plans the control weeds in the Warner Basin. It is important to note that Russian knapweed is also establishing in the Warner Wetlands.

Special Management Areas (SMAs)

I do not support any new Wilderness Study Areas, Areas of Critical Environmental Concern, and/or Natural resource areas because overall the justifications of these proposals are politically motivated. Universally these designations target personal property rights and limit public liberty on the lands. This is my broad view but I would like to specifically address the Juniper Mountain proposed ACEC.

280-3

What is the ACEC on Juniper Mountain supposed to accomplish? Currently the management in this area is sufficient to maintain and improve the ecological integrity. Closing the road through the horseshoe to the top of the mountain would only prevent maintenance to the upper spring and the guzzler. Under the preferred alternative D the wood cutting areas would be closed. What is the harm in letting people cut dead junipers? The mountain would benefit from more junipers being cut which is potential under alternative A.

The grazing around Juniper Mountain is currently done to coincide with water availability and the amount of usable forage. Even though grazing is allowed in the proposed ACEC, the future effects would be reduced numbers, limited seasons of use, and potentially a ban on grazing based on past designated ACECs.

Final Comments

Even though I have many more concerns with the RMP and the preferred Alternative D, I would like to summarize and defer further comments until I see the revised Alternative. One theme throughout the plan that I was disappointed in is how livestock grazing is portrayed as being negative and a manageable evil. It is implied throughout the draft that livestock compete with wildlife, degrade riparian areas and wetlands, spread weeds, and

280-2: Russian knapweed is also listed as a priority species for control in the "Warner Basin Weed Management Area Plan" (USDI-BLM 1999g). The information in ICBEMP referring to the ecological threat posed by medusahead in the Warner Basin is erroneous. Also see response to comment 217-1.

280-3: The area on and around Juniper Mountain has been the focus of research for over 10 years. The old growth stand of junipers on the mountain and associated grass communities offer a unique location for extensive study and research. This research is being carried out by Oregon State University under Dr. Richard Miller at the Northern Great Basin Experiment Station and other researchers. This juniper-big sagebrush-Idaho fescue plant community has been designated by the ONHP as a plant community cell to protect the plant community values. RNA's are managed by the BLM as ACEC's. See also the response to comment 219-2 for an explanation of RNA's.

The road through "the horseshoe" is proposed to be closed regardless of ACEC/RNA designation because of the degradation and erosion impact it has on the wetland/spring/meadow area and because there is little administrative need for the road. The wood cutting area was also being considered for closure, even before the proposal of an ACEC and before the recent fire, because people were cutting live old growth junipers. The proposed management for ACEC/RNA's would protect important resource values without prohibiting all human use of the area. There is no plan to stop grazing or change seasons of use. Any future grazing changes would be based on monitoring the normal allotment evaluation or Rangeland Health Standards and Guideliness assessment process.

are only a cost on public land. With an overall view of the plan it is apparent that livestock is used as a scapegoat for problems that may be caused by weather related events or lack of management.

In conclusion, this is a difficult draft to comment on because it is a hard draft to follow. Just the repetition of information contained in the document alone probably makes it twice as large as it needs to be. In the revised plan the increased use of tables would enable the reader to make comparisons without having to flip through numerous pages.

Thank you for your time and I hope you find my comments helpful.

Sincerely,

W. C. Laird

W.C. Laird
PO Box 13
Plush OR, 97637

Attn: DRMP/EIS

Dwayne Sykes, Mgr.
Lakeview Dist. BLM
1300 South G
Lakeview OR 97630

Dear Mr. Sykes and BLM:

Following are my comments on the Draft Resource Management Plan/Environmental Impact Statement (DRMP/EIS):
I would favor option A.

As an outdoor recreationist who visits the Lakeview District several times a year, I treasure and value the opportunity to explore and enjoy this wonderful space. I am also a senior citizen. I would not like to see road access limited.

I think this public land has the resources and the space to allow continued use according to the status quo. There are many groups and individuals interested in using this space, but I think they can all be reasonably accommodated, through compromise.

I deplore the continuing limitations of public access to public land that have

occurred in many areas. And I'm hoping that under the Republican Bush administration, land uses will not further be limited. Many resource protection measures and already are in effect. I don't believe we need more of these now.

Yours truly,

Alan R. Bach

5460 SW 196th Ave.

Aloha, OR 97007

503-649-9059

alohabachs@aol.com

03-06-02

cc: Gordon Smith, U.S. Senator
Greg Walden, State Representative
Gale Norton, Secretary of the Interior

H F HUNTERS FOR CONSERVATION

— C — *Fighting for Common Sense Conservation*

119 South K
Lakeview, OR 97630
541-947-4328
getty@centurytel.net

4 MAR 02

BUREAU OF LAND MANAGEMENT
HC 10 BOX 337
LAKEVIEW, OR 97630
ATTN: DWAYNE SYKES

RE: Draft Lakeview Resource Management Plan/Environmental Impact Statement, October, 2001

I have read Volume 1 of the Lakeview Resource Area's (LRA) draft management plan and environmental impact statement (EIS) and strongly object to the analysis and proposals set forth within the document. Considering that I don't get paid to review such proposals it will probably take me months to review Volume 2. The proposals set forth within Volume 1 are similar in design as those in the Hart Mtn. Refuge EIS of the early 1990's when the USF&WS saw fit to exterminate Lake County's interests in the mountain.

Having lived in Eastern Oregon nearly all my life and in Lake County for the past 42 years, and having been "schooled" in land management practices by my father, a 30 year veteran of the Bureau of Land Management, I find that the document contains errors in judgment, analysis, and conclusions, and the promotion of misguided environmental (and possibly personal) political and biased agendas.

Since it has been publicly and clearly made apparent by the BLM that they do not wish to receive any public comment (Lake Co. Examiner, 1-17-02, pg. 5) the decision, like the Hart Mtn. fiasco, has already been made and that the course of action and selection of Alternate D is as certain as death and taxes. The entire Great Basin is at risk of being under federal jurisdiction without regard to local public or private interests and concerns.

Just a few of my concerns are listed below. Unfortunately, it would take me months to assimilate all of my comments I have noted in my copy of the EIS document. The consequences of the preferred alternative, Alternative D, are profound and will be much more severe than represented in the EIS document.

CONTINUED

We Support Multiple Use and the Wise Use of Our Resources

282-1

282-1

282-1: The assertion that the BLM does not desire public input on this land use plan is in error. The BLM has repeatedly provided public review opportunities (above what is required by law) throughout the land use planning process, which began in 1998. This included local public scoping notices, public scoping meetings, public review of the "Analysis of the Management Situation" (a precursor to the publication of the Draft RMP/EIS), and public meetings during the draft comment period. This is documented in Chapters 1 and 5 of the main text. With respect to the public comment period on the Draft RMP/EIS, the BLM accepted comments (including yours) for up to 60 days past the close of the 90-day public review comment period provided by law. It is unfortunate that some of the information published in the *Lake County Examiner* concerning this plan, including our desire for public input, was in error or biased in such a way as to generate unnecessary controversy.

The assertion that the decision on this plan has already been made is false. The preferred Alternative D was identified in the Draft RMP/EIS to give reviewers a better idea what the final decision might look like. Numerous changes have been made to the preferred alternative in the Proposed RMP/Final EIS in response to public, Tribal, agency, and internal comments. A 30-day protest period is being provided on the Proposed RMP/Final EIS. The final decision is made when the State Director, after resolution of protests, signs and subsequently publishes the approved RMP/record of decision.

Major Concerns and Objections

1. Jurisdictional Control: The question of jurisdictional control is by far one of the most important concerns that should be addressed. During the Clinton/Gore/Babbitt era, the Interior Columbian Basin Ecosystem Management Project (ICBEMP) was created and financed with illegally appropriated funds with the intent of imposing the "rule of environmental justice" on 63 million acres of public and private land within the Columbia Basin drainage to protect salmon. The Great Basin was thrown in as an after thought. The LRA EIS clearly states on page 1-1 that "When the record of decision is issued for the ICBEMP Final EIS, the appropriate objectives, standards, and management direction *will be incorporated* into this document, or, if necessary, amend the management direction for the LRA" (emphasis added). Essentially, this means that although the LRA EIS document is directed at the management of 3.2 million acres in Lake County, the overall objectives and desired results, aka as the desired range of conditions, will be governed, not by the local BLM district office, but by a hierarchy far removed from the concerns and desires of the local people. The LRA EIS is just French fries. The full meal deal is yet to come.

The plan must incorporate local control with decisions made by a local advisory committee.

2. Watershed-Scale Management and Objectives: Section 4 of Volume 1, Environmental Consequences, stresses that the desired range of conditions may not be met unless management is on a watershed-scale basis. In fact, on page 4-46, the document states that conditions and/or activities occurring on adjacent lands may affect the BLM's "ability to achieve water resource and watershed health goals." Obviously, for the BLM to achieve their goals, it will require more control over private lands and water and will result in new regulations and the unreasonable enforcement of existing regulations to administratively force landowners to cooperate and reduce or eliminate specific uses or irrigation on their land. For example, upstream uses of water or activities on upstream lands may be curtailed or eliminated to accomplish the BLM's goals of water quality and instream flows on the lower BLM's segment. Landowners already have enough problems with the Clean Water Act and the unattainable requirements set forth by the Oregon Dept. of Environmental Quality.

Watershed-scale management allows for too much federal control over private property and there does not exit any civilian system in place for checks and balances. The last ten years have shown that such management techniques are politicized, subjective in nature, and lack objectivity. A local advisory committee consisting of local citizens must be created to control overly zealous goals.

Another disturbing aspect of the document is the BLM's desire to acquire more private land with "high resource values." This can have an extremely negative effect on Lake County and landowners. Essentially, such acquisitions may be staged by restricting or eliminating a multiple-use activity, such as cattle grazing, within an area surrounding a 40 acre privately owned spring thus making the ownership of such property useless to the owner. The possibilities are endless and the pressure to sell will be relentless.

The government already owns more than 70% of Lake County. Additional land acquisitions by the government and environmental groups should be banned.

4. Areas of Critical Environmental Concern and Research Natural Areas: Although, by law, such areas may be designated, the fact remains that by nominating 12 new ACEC's at once is clearly designed to overwhelm the public and discourage resistance and comment. I attended most of the meetings regarding the designation of Lake Abert as an ACEC in 1996 and at that time we were told that other nominations existed, but that none of them qualified. Within three short years, suddenly 12 of 20 nominations previously not qualified, became qualified. Justification for such nominations ranges from the importance of preserving traditional Native Indian uses, rock art and archaeological sites th to protecting BLM sensitive plant species. I find their justifications suspect. After all, why weren't these criteria valid three years prior to implementation of the EIS study in 1999?

ACEC designation must be taken seriously, not arbitrarily. Once designated, management policy and administrative restrictions can be authorized based on the opinion of just one person. Is it by coincidence that eight of the proposed designations overlap with existing wilderness study areas (WSA)—or is it by design? The Wilderness Act of 1964 requires congressional approval in designating any area as wilderness.

282-2

282-2: The discussion on how ICBEMP applies within the LRA has been removed from Chapter 1 and revised within Appendix B to reflect that a final decision (ROD) is unlikely at this time.

282-3

282-3: Watershed scale management is critical to achieving the objectives set forth in the RMP. The discussion on page 4-46 of the draft is only intended to make it clear that the BLM can not, in some cases, achieve plan goals without adjacent landowners (both Federal, state, and private) making complimentary management changes. However, the BLM has no authority or jurisdiction to require management changes on other ownerships.

282-4

The BLM would identify watershed-scale problems, possible solutions, and potential cooperators through the watershed or landscape analysis process. This process is described in Appendix F1 of the Draft RMP/EIS. Watershed analysis is not a decision document and no land management decisions on public or private lands are made. These assessments make recommendations and are used as a basis for future management proposals that are subject to public comment and compliance with NEPA. Private landowners are invited to participate in these assessments, but their lack of participation does not preclude completion of the analysis with the best information available. Management changes on other ownerships could be accomplished through partnerships or cooperative projects with adjacent landowners. A good example of this approach can be found in the implementation of the "Warner Basin Noxious Weed Management Plan" (USDI-BLM 1999e) by USFS, BLM, and private landowners in the Warner Basin. The BLM would be a willing partner in Watershed Councils, and as the commentor correctly points out, these councils are the place to allow local landowner and group direction for watershed-level management. The successes of the Goose Lake, Chewaucan, and Silver Lake Councils are also good examples of how local groups can have a positive watershed-scale influence. To meet the national mandate for clean water, the groups must be active and effective.

282-5

It took the BLM 25 years to inventory possible sites and those sites have remained stagnated as WSA's for 13 years since 1989 when the inventory was completed. Does it not appear that some force within the BLM, be it local, state, regional or national, have tired of Congress's lack of interest in approval and is now forcing the issue by abusing some previously seldom used section of the Federal Land Policy and Management Act (FLPMA) of 1976? This is clearly an abuse of the original intent of the law and it is imperative that Congress authorizes ACEC designation in the same manner as wilderness. Should Congress decide to return WSA's back to multiple uses, the stigma of an ACEC or research natural area remains.

Research natural areas (RNA) are supposedly managed to preserve natural features and ecosystems for research, yet the document maps show them following straight lines north and south and east to west. These arbitrary borders do not coincide with natural features or an ecosystem (usually a watershed, sub-basin or basin). The same applies to many of the proposed ACEC's. Of course, once an area is designated an ACEC or RNA, the borders of those overlapping WSA's will eventually and miraculously expand in direct proportion to the size of the WSA's they overlap either by lawsuit or administrative directives.

Using special status species, such as a BLM sensitive species plant, is reaching beyond the intent of the law authorizing ACEC designation. A sensitive plant could probably be "found" just about anywhere in Lake County depending on who conducts the "survey." It seems that as each year passes, the criteria for sensitive, threatened and endangered designation gets weaker and the excuses for ACEC designation grows exponentially.

Protecting a sensitive species does not require ACEC designation, only temporary alterations in current use(s).

As for using traditional Native Indian cultural values, rock art and archaeological sites for justification, one can only ask what is the true intent. Page 1-6 states that "... Native American groups consider the resource area part of their ancestral homelands and want to continue to have access to the land for ceremonial and religious purposes and to hunt wildlife and gather plants..." They already possess that right, as we all do. Using such justification to designate an ACEC for such purposes is circumventing congressional approval for reservations. Care can be taken to avoid undue or premature deterioration of sites important to local Native Indians without designating tens of thousands of acres for the use of only a few individuals. This type of justification can soon get out of hand much like the Antiquities Act, which was designed to protect such sites as the Anasazi ruins in the southwest, and which has since been horribly abused in recent times by incorrect, if not flawed, and zealous interpretations of the Antiquity's Act and other acts and administrative rules. There is also the risk that ACEC's designated under the premise of protecting traditional American Indian cultural values will eventually end up under the authority of the Bureau of Indian Affairs by administrative or executive order, which, I would think, even the Native Indians would not want.

All 12 proposed ACEC's/RNA's can be managed for a desired range of conditions without ACEC/RNA designation by simply altering current management practices and without excessively restricting or eliminating access or existing multiple uses. ACEC designation was designed to protect areas of real importance to American society as a whole, not just for a few individuals who "would like to see" the area protected.

No more special management areas (SMA's) should be considered and existing SMA's should be reviewed for validity and returned to multiple use. Only Congress should have the authority to designate SMA's.

5. Road Closures: The proposal to close 412 miles of roads in special management areas (SMA) is very disturbing. The LRA has a very low road density. Closing existing roads only leads to other problems such as overcrowding and eliminates opportunities for recreationists to experience what the LRA truly has to offer to them — open and primitive recreational experiences. Crowding people onto fewer roads will destroy the essence of that experience.

The document does not consider two-track roads as being included within the LRA's transportation plan. Coupled with the fact that the maps included in the EIS are wholly inadequate and the fact that the document speaks extensively to closing roads when deemed "not needed" or to protect soils, road closures will exceed the proposal much more than the EIS proposes.

282-4: Refer to comment response 269-5.

282-5: Many ACEC's have been nominated since the management framework plans were completed in 1983. Two were addressed during that time by the preparation of plan amendments: Warner Wetlands (USDI-BLM 1989c) and Lake Abert (USDI-BLM 1996d). Most of the current proposals were initially presented by the ONHP (Vander Schaff 1992). Several ACEC's were later proposed by Native American Tribes; one was proposed by the Oregon Natural Desert Association (ONDA 1998); it was subsequently evaluated and dropped from further consideration (USDI-BLM 1999b); one was proposed by a researcher in 1999; and boundary adjustments were proposed by BLM staff. These nominations did not occur all at once. When the Lake Abert ACEC was proposed in 1995, there was an urgency to address the proposal due to the potential impacts of proposed sodium leasing and pump-storage hydroelectric projects in the area. During public meetings held at that time, the BLM stated that we were aware of other nominations, but were not going to address them until we had prepared a comprehensive RMP. The BLM never stated that the other proposed ACEC's did not meet the ACEC criteria.

282-6: You are correct that the proposed ACEC/RNA boundaries do not follow natural features. Initially the BLM considered boundaries that followed natural features; however, such boundaries are difficult to define by a legal description. Legal descriptions are important for the notation on official land records (master title plats) and enforcement of resource use restrictions. Therefore, the BLM increased the boundaries somewhat to encompass the first legally definable land line (section, quarter-section, right-of-way boundary, etc).

282-7: Refer to comment response 114-3.

282-8: The BLM is not attempting to circumvent congressional approval by designating ACEC's with significant cultural values. In fact, Congress specifically mandated that the BLM designate such areas under FLPMA (refer to 43 CFR 1610.7-2). Section 202 of FLPMA states, "... in the development of land use plans, the Secretary shall give priority to the designation of and protection of ACEC's."

The most alarming aspect of the proposal in closing roads to the public is leaving them open to government employees and "interested parties" for "administrative purposes." Everyone, including government employees, should be required to enter such road closure areas in the same manner as expected of the majority of the public and that is by foot. I fail to see why we should allow the development of an aristocratic society wherein a privileged class of individuals would be allowed entry into an area closed to 40-60 million handicapped citizens and the remaining general public. There is no compelling reason for a government employee or "interested party" to require special consideration in these areas. As long as the grass grows and the winds blow, nature will take care of itself and it doesn't need government to check up on it. Researchers can pack in and plan to stay a few days in the same primitive fashion expected of the general public.

The proposal's most questionable justification for closing roads is soil compaction and/or erosion and the arrogant assumption that without road closures, watershed goals cannot be met. After 42 years of driving nearly every road in Lake County, I am not aware of one single road on BLM land that has a negative effect on the environment to the degree the document claims. True, there are a few roads that are built too close to riparian zones, creeks and springs, but that can be corrected with little effort and still leave the entire road open to the public. This type of mentality represents square foot (if not inch) management. Roads proposed in the document for closure represent an infinitesimal percentage of the area that the closures are suppose to protect.

Roads serve as fire breaks and facilitate fire fighting activities.

The document also complains that activities such as parking and camping along a road have a negative impact on the watershed. This suggests that administrative directives will soon eliminate camping along all roads except at designated and developed camp sites. What happened to the primitive recreation experience the document promises?

Soil compaction is only temporary. Has anyone in the local office ever tried to drive some typical wet desert roads in the Spring? I have lots of pictures of BLM pickups buried to their frames in mud. Soil compaction and/or erosion are weak excuses and no excuses at all.

The end game of a road closure strategy is to shut out the public and create artificial roadless areas, which equate to artificial wilderness areas, accessible only to a chosen few that are allowed to use vehicles for "administrative purposes." Our public lands will become nothing more than playgrounds for bureaucrats.

No new road closures. Roads currently closed must be reopened.

6. *Prescribed Burns and Wildland Fire Policy:* The proposal to treat over 480,000 acres per year with fire gives "playing with fire" a new meaning. One only has to think back to 1999 and the Beatty Butte "controlled burn" which exceeded the planned acreage by 300% and destroyed prime mule deer and sage grouse habitat. It will take 50 years or more before the area returns back to an acceptable condition. Unfortunately, deer and sage grouse don't live that long and we, and the people making this proposal, will all be dead, not knowing if the BLM was right or wrong.

Prescribed burning is most likely the most puzzling proposal of all. First of all, where did the BLM get the idea that Lake County was "grassland"? If one reads the journals of Peter Skene Ogden and other early trappers, and the journals of early pioneers and explorers such as John C. Fremont, the area was a sea of "worm wood" (sagebrush) so thick in some places that it nearly stopped wagon trains. Pioneers had to travel ahead and cut it down so horses and oxen could pull the wagons through and they had to travel miles and/or even days to find adequate feed and water for their animals.

Sagebrush is the natural vegetation of this county. Native Indians depended on it for shelter and fuel. Considering that Native Indians are believed to have traveled in family groups of 20-40 individuals, has anyone ever figured out how many acres of sagebrush it would have taken to cook and shelter and warm that many individuals for one year? Old photos dating back to 1868 clearly show that sagebrush dominated the higher ground while grasslands were concentrated in riparian areas and valleys. Even then, lowlands were dominated by rabbit and sagebrush. The town site of Burns had to be first cleared of sagebrush before any buildings could be built.

282-9: The road closure issue was readdressed during the preparation of the Proposed RMP/Final EIS. The BLM continued to update its road/trail inventory after the Draft RMP/EIS went to press. The number of road miles proposed for closure within the proposed ACEC's have been reduced in the preferred Alternative D compared to the Draft RMP/EIS. However, road closures within some WSA's were overlooked in the draft document. This has been corrected in the Proposed RMP/Final EIS, preferred Alternative D. The road closures within WSA's represent roads that have already been closed in the past or are new roads that did not appear in the wilderness inventory (USDI-BLM 1989a, 1991a) and must be closed immediately to comply with the wilderness IMP (USDI-BLM, 1995b). The specific road closures are highlighted in Table 4-4 and Maps SMA-5 through SMA-32.

282-9b: ACEC/RNA's will be managed to protect specific resources. This includes limitations on off-road use. Off-road use can cause an increase in soil compaction and erosion which decreases the productivity of the vegetation community. Primitive camping is not prohibited in any ACEC/RNA or any of the planning area. Over half of the planning area remains available for off-road use. (This response is general in nature, as is the comment.)

282-10: Only specific roads are proposed for closure under the preferred Alternative D. In all cases, other roads are left open in the same general area, providing some public access. No "roadless areas" are being created. Refer to Maps SMA-5 through SMA-32. It is worth noting that all roads within WSA's that are designated as wilderness by Congress would likely be closed at the time of designation. Such areas would then become "roadless areas."

282-11: The northern Great Basin is a shrub-steppe community, which is, by definition, a shrub-grassland community. This community has been present for thousands of years. The main question is, what has been the relative proportion shrubs and grasses? The introduction of domestic cattle, sheep, and horses has had an impact on plant communities, as is evidenced in many scientific pollen, woodrat midden, and other studies. In the last 100 years, a great increase in the composition/dominance of juniper, mountain mahogany, sagebrush, and other shrubs has occurred, to the detriment of the underlying grasses and forbs. This is not necessarily good or bad. Grasslands are fire-dependent communities. By stopping wildfires, introducing grazing animals into areas where few were prior to contact (there is very little evidence that many buffalo or elk were grazing in the area pre-contact), changes in climate, and the introduction of cheatgrass (thus creating a more frequent fire regime), today's landscape is quite different than at contact. The same plants are here, but in different numbers or relative proportions. There are many more shrubs and less grass today (Mack and Thompson 1982).

One of the major problems we have in land management today is that government employees are somewhat itinerant in nature. Many of them seldom stay in one area more than five to ten years on the average, depending on their desire to climb the ladder. Most of them are ignorant of the local history and only a few make the effort to research the area by reading first hand accounts of explorers and pioneers or interviewing their descendants. Decisions are made based on textbook philosophy, something that Leopold despised. I strongly suggest that everyone read such books as *Harney County, Oregon, and its Range Land* by George F. Brimlow, *The Black Rock Desert* by Sessions S. Wheeler, *In Times Past, A History of the Lower Jordan Creek Communities* by Hazel R. Fretwell-Johnson, *The Oregon Desert* by E. R. Jackman and R. A. Long, *Owyhee Trails, The West's Forgotten Corner* by Mike Hanley, Ogden's and Fremont's journals, and one other book about Bill Brown and Wagonfire Mountain, the title and author of which escapes me. These books have accurate descriptions of what Southeastern Oregon was like during the pioneering era and before revisionist history.

All wildland fires should be aggressively attacked. They all pose danger to life and property. No fire should be left to burn "its natural course" to "benefit the environment." As expressed by the *The Durango Herald* shortly after a government prescribed burn in Colorado got out of control and burned thousands of acres: "As smart as we think we are, there's more to learn about how to live with the environment, including replicating nature's management techniques [fire]." Prior to the 1930s, 20 to 50 millions acres burned nationwide each year. During the 1930s, 40 to 50 million acres burned annually. By 1960, only five (5) million acres were burned by wildfire. Considering that this EIS proposal is being considered in other districts in Oregon and other states throughout the west, one can only imagine the consequences from underestimating a fire's potential. I believe California, Montana, Colorado and New Mexico are fully aware of what happens. So is Lake County. Beaty Butte and Juniper Mountain come to mind.

Prescribed fires (at one time referred to as controlled burns before someone found out that there is no such thing) are unnatural during the spring and fall. Fires occur naturally during the summer months. Lightning fires are natural and with them usually come nature's fire trucks — the rain clouds. Not too long ago on a BLM field trip in the Beaty Butte area to observe a burn at and south of Buckaroo Pass, A. K. Majors of the State Land Office asked what the major fire frequency of the area was. No answer was given. No one knew. Based on his experience and knowledge of the area, he suggested that it may be between 200-500 years. The document claims that we must reintroduce fire "back into the ecosystem." Considering that it has only been in the last 80 years or so have we made attempts to control wildfires to any extent, we should be waiting another 120-420 years before we do so!

I seriously doubt that this country could stand or afford the burning of 50 million acres each year. All wildland fires must be aggressively controlled.

The document also contradicts itself in that it insists that fire must be reintroduced into the area, but such strategy "should emphasize protection... of key habitats" (pg. 3-107). Evidently, fire is OK for some habitats but not others. The EIS document also claims "Lightning-caused fires in excess of 100,000 acres have occurred periodically in the rangeland fuels on the LRA." I'd like to know when and where and whether or not a few fusees helped out on the acreage count.

Simply put, fire is natural only during the warmest months of the year (which does not include spring and fall). Therefore, if fire is to be used to replicate nature and re-establish the evolutionary processes of plants, burning must occur during the natural fire season. However, prescribed burns in the summer months will only lead to disaster. The fires will be too hot for the purpose intended and uncontrollable (recall the prescribed burns in California and New Mexico which destroyed homes and caused millions of dollars in damage). Mechanical and chemical methods of rangeland vegetative manipulation would be the primary choice with fire only on a very small scale, and only after fuels in the area are reduced by mechanical, chemical or livestock grazing methods.

Juniper should be cut down or chained, stockpiled and then burned or left in place in some areas to rot. Downed juniper can serve as a barrier to protect an area temporarily from livestock grazing to allow natural vegetation to re-establish itself and to restore riparian zones. Chaining would be the preferred method since it is controllable and also serves to disturb the soil and promotes a faster recovery of grasses and shrubs. The Hart Mtn. Refuge uses juniper cutting to achieve their goals (pg. 4-75). Juniper has encroached on many sites but it also serves as important wildlife habitat. It provides shade in the summer, protection from

Fremont came through the area in late November and early December. He refers to grass being available for his horses in the Hogback area and in the Warner Valley. Ogden was looking for beaver and cared little for describing the vegetation, except when related to lack of grass for his horses. These descriptions are interesting from an historical perspective, but do not represent scientific study. The descriptions of Harney/Lake Counties in the RMP are based on scientific studies of climate, vegetation change, biogeography, as well as the old histories and diaries. This evidence does not support the idea that this area was a "... vast sea of sagebrush."

282-12: A.K. Majors based his question on his tenure/experience here in the Lakeview District. Up until the mid-1990s and year 2000, there had not been a recent, large wildfire in the Beaty Butte Allotment (see Map FM-2). However, current evidence suggests that lowering the shrub densities while protecting some wildlife cover is appropriate for a number of reasons. The 2000 wildfire area overlapped areas that had been prescribed burned under controlled conditions in the late 1990s. The wildfire stopped or did not burn far into the prescribed burn area due to lower shrub densities/lack of fuel. In contrast, it burned very hot across lands to the east, driven by winds into area where no fire had been introduced. The prescribed fire area is returning to native forbs, grasses, and shrubs. The wildfire area has been severely damaged, causing erosion and habitat degradation and requiring extensive fire rehabilitation activities.

Fire return intervals are based on averages over a large landscape, in this case probably the 10 western states. Over the large landscape, a bell-shaped curve becomes involved. In some places, it may be 5 years or less (cheatgrass areas), or it may be several hundred years due to local conditions (differences in vegetation types and moisture regimes). The 200–500 year timeframe is unsubstantiated opinion. See also response to comment 282-25.

the wind in the winter, and as escapement cover. Juniper eradication should occur in a sporadic pattern. Not all juniper should be eliminated from any one area. Only mechanical or chemical methods can achieve predictable results.

The juniper problem isn't just from grazing and fire suppression. Let's put all the players in the "blame game." Utilization and eradication has been restricted or prohibited by government policy and/or regulations for years. Juniper encroachment occurs naturally as well. Coyotes, birds and other animals carry the seed downhill (and uphill). Water flows also spread juniper. Grazing had little to do with it. It is mostly due to man's inactions, not actions.

Contrary to popular believe, Native Indians did not run around the countryside burning everything in site. Fire was used for specific purposes and, depending on the area, was used to clear trails, drive game or, as in Lake County, small sites were burned to produce a supply of food plants. Yes, its true. They were farmers, but they didn't really understand the biological intricacies of their actions. They were survivalists; opportunists who saw a cause and effect, and if their actions produced the desired results, the better off they were. Early journals clearly show that many of the natives in the LRA and Harney County were near starvation, an indication that food was in short supply and that sustenance required a great deal of effort. In fact, early explorers nearly starved as well due to the lack of game in the area. The LRA was not the comucopia that many misinformed people think it was.

With 270 million people now living in this nation, it would be foolish to return the LRA (as well as the Great Basin) back to its "natural condition" of dangerously low large mammal populations. Minor errors in judgment could effectively bring them to the brink of extinction. As our population increases, it will take proactive management based on proven agricultural methods and wildlife practices rather than unproven preservationist theories.

The document states that of the one million acres to be treated with fire, the BLM expects to burn only 40-70 percent of an area's vegetation for each prescribed burn to produce a mosaic pattern. Considering past experiences in Lake County and other areas across the nation, plan on a 100 percent burn and a 200-500 percent increase in acreage, a slower than predicted recovery rate, and the extermination of many wildlife and plant species. Keep in mind that an uncontrolled prescribed burn is the same as a wildland fire, which, under Alternative E, is described as removing large proportions of shrub habitats that "would take decades for shrubs to re-establish..." and "wildlife species will decline over the life of the plan" (pg. 4-64).

Fire should be used only on a small scale in mosaic patterns. Burns should be no wider than 1,200 feet across at any one point (Leckenby, et al, *Wildlife Habitats in Managed Rangelands - The Great Basin of Southeastern Oregon*, March 1986, General Technical Report PNW-139). Although I disagree with the use of prescribed burning in the spring or fall, prescribed burns should be accomplished during times when they actually have to be "forced" to burn. In other words, it may require men on their feet with torches constantly keeping the fire progressing. Dropping fire balls from a helicopter and sitting in a pickup watching it burn is unacceptable.

7. Wildlife Management: As discussed under Prescribed Burns and Wildland Fire Management, once again the document has made conclusions that are contrary to the historical record. The document emphasizes bighorn sheep management. A few weeks ago I read an article in the Herald and News regarding the upcoming bighorn sheep capture on Hart Mtn. that falsely stated that bighorn once "numbered in the millions in Oregon." That statement is false. There is no historical evidence that bighorn sheep were numerous in Oregon or Lake County. The books I mentioned above barely mention them. Pioneer journals report only occasional sightings and Ogden's party had to eat their own horses and purchase dogs to eat from the Native Indians in this area. Considering the terrain they inhabit and the difficulty of hunting them, Native Indians most likely ate bighorn that died from natural causes or were injured and easily killed. To them, killing a bighorn was a rare occasion and valued on the same level as a modern hunter who manages to harvest an 8-point monarch elk.

This section of the document (which begins on pg. 4-54) makes several assumptions in error. One is that mineral exploration and power lines will displace bighorn sheep. Is that why I can drive up to bighorn and walk within 100 feet of them to take pictures along the highway at Adel or watch them graze under power lines on Fish Creek Rim? They also stand in the middle of the highway along Deep Creek and get so close

282-13: Seton (1929) estimated that bighorn sheep once numbered between 1.5 and 2 million in total number throughout their range in the early 1800s. We agree that it is doubtful that they numbered over 1 million in Oregon.

We disagree with your statement that mineral exploration and powerlines would not displace bighorn sheep. The document states that if mineral exploration were to occur it would "... cause displacement of bighorn sheep from the localized area during operation periods."

to your vehicle they could snort and on your windows (so much for road closures). Wildlife adapt. Backyards in Lakeview are home to deer and cougar. Honkers drink water and gather gizzard grit 10 feet away from my office building.

Seasonal and/or permanent road closures supposedly designed to protect game animals are not necessarily a good idea. The mere presence of human activity can deter predator activity, especially during the winter. Hunters can exercise some degree of predator control and our sudden appearance over a ridge can disrupt a predator's stalk. Closing roads will eliminate that. Predators kill far more game than poachers.

Simple observations from the highway will show anyone that deer know that and graze adjacent to right-of-ways and developed areas, not just because the food supply is there, but for safety from predators as well. Textbooks are no substitute for field observation.

What is very disturbing is that under the special status animal species section, the document suggests that the Cabin Lake Mule Deer Winter Range Cooperative Road Closure be continued and expanded. I was unaware that mule deer in Lake County were considered a special status, therefore, a sensitive or threatened, species.

Historical records, diaries and journals clearly show that prior to settlement, Eastern Oregon had little game. It wasn't until after several decades of livestock grazing that the pioneers started to observe large numbers of deer and antelope: this at a time when Pete French alone was running 20,000 head of cattle and Miller was running 1,000,000 head without government intervention. It was the lack of game regulations that resulted in low game populations and it was recognized that strict regulations and, at times, season closures, combined with predator control would bring back populations. During the 1950s and 60s, the BLM began their adjudication process. Deer, antelope, sage grouse, chukars, rabbits and other small animal populations were at their peak during a time when four to five times the number of cattle, sheep and horses were present on the range. Unfortunately, grazing was curtailed in the mid-60s (nearly one-half in the Beatty Butte unit) at the same time predator control was decreased from three government trappers to one. Since then grazing has been reduced even more. The range has been improving for the last 35 years, yet wildlife populations have been declining. Deer populations east of Adel are a mere fraction of what they were 30 years ago. In 1959, the antelope population was estimated at 12,000. We now brag about 2,000. It is plainly obvious that grazing had nothing to do with the current decline of wildlife populations.

Many studies have shown that livestock grazing is beneficial to deer and antelope. Without getting into great detail, deer, antelope and livestock have a symbiotic relationship. Both species feed with cattle for safety from predators. Livestock grazing also encourages new plant growth from which deer and antelope benefit. Again, textbooks are no substitute for field observations.

Single-species management will benefit many other species since only one real problem exists and that is predation. Predators are the number one cause of the decline in deer, antelope and sage grouse populations, yet the document doesn't speak to this management tool and instead, proposes to backfill many reservoirs, especially in playays, which hold water longer throughout the year and disperse wildlife. Wildlife will be forced to concentrate on fewer water sources where coyotes, hawks and eagles can prey on them. Predators learn where to look for their prey and return time and time again to the same area. This learned behavior is passed on to their offspring. This learned process adversely affects fawning areas and sage grouse leks and nesting areas since the same areas are used over and over again. All the habitat in the world won't hide a nesting hen from a thorough search by mother coyote and her pups. Crows, ravens and squirrels also behave in the same manner. That is why predator control is so important to any wildlife management plan. Learned behavior must be disrupted from time to time.

Does the nine mile buffer between bighorn sheep habitat from domestic sheep and goats include a prohibition of domestic sheep and goats on private land?

Emphasis on bighorn sheep lacks historical data for justification of the management strategies proposed. Emphasis should be placed on mule deer and antelope, the only viable large mammals which will respond to appropriate management techniques while at the same time allowing for economic uses of the area. Emphasis on mule deer will enhance bighorn sheep populations as well.

These impacts would be localized to the immediate area or human disturbance. Mineral exploration would not permanently remove sheep from a given area. In addition, the document states that impacts from large-scale powerlines would “. . . be significant if large areas of bighorn habitat were impacted.” We do not expect this to happen, based on the fact that most powerlines avoid bighorn habitats.

We disagree that human presence can be a major factor in deterring predator activity. It is true that recreational hunting of predators can reduce their numbers, but impacts from human disturbance would have more impacts to the prey species than as a deterrent to predators.

282-14: Your statement about the Cabin Lake Mule Deer Winter Range Cooperative Road Closure being considered in the Special Status Species section is confusing. This seasonal closure is not discussed in that section. It is however, discussed in the Wildlife and Wildlife Habitats section of Chapter 3.

282-15: Refer to comment response 243-13.

282-16: The 9-mile buffer only pertains to BLM-administered lands. ODFW does not propose bighorn sheep reintroduction or augmentation in areas where domestic sheep occur on private land within this 9-mile buffer.

8. Wild and Scenic Rivers: Was this section put in the document for a little humor. The recommendations for such are beyond common sense and are clearly an abuse of the law. Any reference to wild and scenic rivers in the LRA should be permanently stricken from the record.

9. Other Issues: If 25 miles of road closures are OK under the most radical alternative of them all, Alternative E, then why is not OK under all of the other alternatives?

Alternatives C, D and E are not "reasonable alternatives."

Recreation use is not increasing in the LRA except possibly in or around the sand dunes area. Recreational use in 98% of the LRA is a mere fraction of what is was 30 years ago. For example, deer hunting in the Beatty Butte unit has decreased from 700-800 tag holders down to 200. This scenario is true with all the hunting units in Lake County. I travel extensively throughout the eastern portion of Lake County during all seasons of the year and seldom see anyone, including BLM employees.

Leave the area primitive, as it is, with the roads we have.

OHV use should be allowed throughout the LRA. It is the ODF&W's responsibility to regulate how those OHV's are used by hunters. Soil compaction or erosion is no excuse for prohibiting OHV use. Management of such should be site specific.

Plan monitoring must be performed by a local civilian advisory group. Allowing the same people who made the proposal serve as monitors is like putting the dog in charge of the butcher shop.

The Governor of Oregon wouldn't know bear scat from wild honey. His office will just rubber stamp the EIS.

Page 2-11 suggests that there is a future demand for juniper harvest. How can that be when it is proposed to burn them all down in less than 10 years?

Page 2-12 indicates that only 7.35 miles of streams are nonfunctional. Not bad after 150 years of grazing, especially when you consider that the government has essentially controlled grazing only in the last 35-40 years since the adjudication process of the early 1960's. It would take little effort to revitalize those stream segments and it doesn't require Alternative B, C, D or E.

Microbiotic Crusts: That was debunked years ago. Just goes to show you how grants distort and corrupt research. Environmental research is like cancer research: the money is in the treatment, not the cure. In other words, grants don't exist unless there is a "crisis."

Most springs are privately owned. If the BLM has a complaint about livestock use, then spend the money on barbed wire, not paperwork. The BLM has long ignored spring developments that the BLM developed in the 1960's and 70's. The BLM has wasted their own efforts.

The federal government has no right to own or possess any water right in the State of Oregon.

If cutthroat trout were introduced in Guano Creek in 1957, then they are not indigenous to the area and should be of no concern to the federal government. Wildlife is the property and responsibility of the State.

The 20 to 30 percent decline of the antelope population since 1991 directly corresponds with the negative actions of the Hart Mountain National Wildlife Refuge of eliminating grazing and letting predators take control.

I fail to see why alphabet acronyms should be attached to tens of thousands of acres because some special status plant species are "suspected to occur in the LRA" (pg.2-35).

Listing the wolverine and lynx on page 2-38 is gross misrepresentation. Of the 21 bureau sensitive species listed on page 2-39, 15 are unknown or "suspected" to occur in the LRA. Table 2-25 is gross misrepresentation of the facts. Since when is suspicion a valid criteria? I am surprised bigfoot is not on the list. Listing them insinuates they should be there and some Chicken Little will be demanding their "reintroduction." Only known species should be listed.

282-17

282-18

282-19

282-20

282-17: Under the preferred Alternative D, only 0.3 percent of the planning area would be closed to OHV use. The remainder of the resource area would under the open designation (55.7 percent), limited to existing roads and trails (31.8 percent), and limited to designated roads and trails (12.2 percent) (see Table 4-5). The BLM is responsible for the management of OHV uses on public lands (federal lands), not the ODFW.

282-18: You are in error on this point. Under the preferred Alternative D, only up to 50 percent of the existing juniper stands would be treated over the life of the plan, using all techniques (fire, mechanical, and beneficial uses such as firewood, poles, and biomass energy). Refer to the Forest and Woodlands, Management Goal 2, Alternative D section of Chapter 3.

282-19: Currently, the BLM holds multiple water rights issued by the State of Oregon. This is supported by state and Federal laws.

282-20: Table 2-24 lists several species that may or may not occur within the current planning area. This list was generated by the USFWS (as required under the "Endangered Species Act"). This does not mean, however, that these species would be reintroduced to Lake County. Habitat areas for some of these species, like lynx and wolverine, are very limited, and populations of these species, if present, were probably at very low densities historically.

Table 2-26 misrepresents historical forage allocation in that it includes information only from the past ten years. Let's put the facts in perspective. How many livestock AUM's were authorized in the 1930's, 1940's, 1950's and 1960's? Why does the BLM hide the fact that AUM's have already been drastically cut?

Nonnative seedlings were not just for increasing livestock forage (pg. 2-45). They were also designed to pull cattle down from the uplands to help conserve wildlife habitat. I know that for a fact. Even the "old school" BLM'ers were thinking of wildlife.

There may have been some concern over feral horses in the 1960's, but the only one crying was Wild Horse Annie. Horses cause the damage and the cow gets the blame. We can thank Clark Gable and Marilyn Monroe for that.

Webster's dictionary defines native as belonging to a particular place by birth and an American as a citizen of the United States. That makes me a native American.

Just because the LRA is considered by some to be one of the richest archaeological resources in the Nation in terms of site numbers and age doesn't mean it is that important to archaeology. The amount of interest in archaeological history does not justify the cost. All excavations should cease with only Native Indians performing such work if they so desire.

Ninety-nine percent of all surface archaeological artifacts are gone. They were picked up long ago. There will never be a complete record nor will anyone ever decipher "rock art." If Native Indians are so adept in their historical recollection of religious ceremonies and cultural food plants, why can't any of them read "rock art?"

Native Indians aren't the only people who are connected to the land.

How many Native Indians practice their religion on public lands within the LRA? I have lived in Lake County for 42 years and have yet to see any Native Indian practicing any ceremonial activity or collecting plants anywhere in the LRA let alone even seen one in the desert except during hunting season or on a BLM field trip.

What does it mean some sites might be used for non-Native practices (pg. 2-56)? Does that mean praying to a Christian god would somehow "contaminate" the area? The majority of native sites were (and have been) abandoned hundreds, if not thousands, of years ago by the people who once used them. Most sites (and possibly most of the rock art) were generated by the Llano culture which disappeared long ago.

Since there is no written record of Native Indian history, one has to consider the fact that there is an element of creative factual augmentation involved.

Suspected devil worship? Come on now. If the BLM is willing to set aside huge tracts of land for what the modern world considers a pagan religion full of superstition then why not all religions? All religions consist of fairy tales, bedtime stories and superstition. Where does the government draw the line? Although I think devil worshippers are crack heads, this country was founded in the name of religious freedom. Read the First Amendment.

Separation of church and state: The government has no business designating public property for the exclusive use of a minority for religious purposes.

If Indian culture did not believe that anyone owned the land, why then, is there now a demand to own it? To the American Indian, land was public in the sense that no one person owned land, and that is how public land should remain — public land, accessible to all of us.

The document portrays Lake County's economy as nothing more than a grain of sand on the beach and quickly working its way into the service industry, with people working for minimum wage and living in poverty, and dependent on government handouts. The poverty factor used is nine years old and economic figures date back to only as far as 1990. The document also fails to equate recent dollar values to 1990 dollars. Comparison charts must include economic values for the last 30 to 40 years with dollar values equated to current dollar values to accurately describe the negative impact on the economy by oppressive governmental regulations that have occurred during that period.

282-21: The intent of the table is to identify the current forage allocation in the resource area. Livestock grazing has decreased since the enactment of the "Taylor Grazing Act" in 1934. The grazing adjudication in the early 1960s further refined the amount of livestock grazing. The "Lakeview Grazing Final Environmental Impact Statement" and "Record of Decision" (USDI-BLM 1982a, 1982b) reduced permitted livestock grazing by 4.5 percent (7,162 AUM's). The resource area continues to review existing grazing permits and analyzes grazing through allotment evaluations and Rangeland Health Standards and Guidelines assessments. See also comment response 243-4.

The nonnative seedlings were utilized to increase livestock forage and, as the comment indicates, reduce livestock use in upland areas, thereby benefiting upland rangeland and wildlife habitat.

282-22: The BLM is required to follow Federal law, which defines *Native American* much differently than the dictionary.

282-23: This section has been clarified. Refer to the Cultural and Paleontological Resources section of Chapter 2. The First Amendment guarantees the right of religious freedom for all, and prevents the establishment of a government-mandated religion. Neither the First Amendment nor any other part of the Constitution mandates the separation of church and state. That is a concept developed through Supreme Court interpretation. Having said that, other Federal laws guarantee Native Americans the right to carry out traditional uses, including religious practices, on public lands. To our knowledge, the idea that this violates the First Amendment has never been tested in court. Refer also to comment response 2-2.

All economic analyses must also include what the potential of the economy could be provided all resources were utilized to their full or near-full potential. Only then will there be a true comparison of the impact of the proposed alternatives. It is imperative that the document discusses the potential of the area and determines ways to improve the economy with resource development. Tourism is not the answer.

The Oregon Tourism Commission's estimate that \$11 million dollars was spent on travel-related spending in Lake County is pure hogwash. Such "studies" are designed to make the services of such governmental agencies more valuable, and therefore, needed. It represents false hope. As I mentioned before, I travel extensively throughout the eastern portion of the LRA and seldom see anyone, if at all, except during hunting seasons. Obviously, the majority of tourism dollars are generated from hunting seasons with the remainder being spent on fishing and tourists traveling through on highways to some other destination not in Lake County. Emphasis on bighorn sheep management will actually decrease tourism expenditures since the proposed Alternatives B through E and lack of predator control will ensure the continuing decline of deer, antelope, bighorn, chukars and sage grouse.

Page 2-77 claims that the "mountain big sagebrush fire regime where much juniper has encroached today, typically burned every 15 to 25 years." However, on page 2-78, "Sagebrush fire return intervals are difficult to determine since fire histories cannot be accurately studied." Which is it?

Sixteen thousand people do not stop at the Abert Lake Watchable Wildlife Site. I drive by there at least a dozen time each year at different hours of the day and never see someone parked there. The ones that do stop use it for a garbage dump. People use it for what it really is -- a wide spot in the road and a place to urinate.

Page 2-81 claims that 8,000 visits occur at the Warner Wetlands and those visits are "mostly associated with Hart Bar." Table 2-47 claims that 14,500 visits occur there, a discrepancy of 6,500 visits. Very seldom are vehicles parked there. Use is most likely confined to the toilet facilities. Much of the visits to the Warner Wetlands are from local citizens. Others are by visitors heading to Frenchglen and other destinations via Hart Mountain. Greasewood is not very appealing to most people, even greenies. The Warner Wetlands just happens to be on the way. If it weren't for crapple there would be very little interest in the area. Most of the flatlanders mistakenly assume much of the private land as being part of the BLM SMA. Understandable, since that is where most of the wildlife is located.

Mining at Tucker Hill will miraculously be OK once the tribes begin receiving the royalties.

9. The Good, Bad and Ugly: Now, for the bad news. If Alternate D is selected, within five years the LRA will be operating under Alternate C goals simply because so many Alternate D goals are similar to Alternate C and the transition will go unnoticed by the public. Alternate D seems to be designed for just that purpose. If Alternate A is selected, within five years the LRA will be operating under Alternate D and later under Alternate C. Why? Simply because the bell has been tolled. How do you "unpropose" 12 ACEC/RNA's that have already been approved by inclusion within the EIS document. Just because ACEC/RNA's that have already been approved by inclusion within the EIS document. Just because Alternate A is selected doesn't mean the proposed ACEC/RNA's will go away. ACEC/RNA's proposals should never have been included in the EIS document. Instead, they should have been required to stand on their own merits one at a time and require congressional approval. ACEC designation by administrative opinion is getting completely out of hand.

If Alternate D is selected, many more ACEC/RNA's will be nominated, especially the eight that weren't selected (at the moment, anyway). They, too, will become eligible just like the 12 that weren't just three short years after their nominations were declined. Lawsuits, and the threat of lawsuits, will ultimately shut down even more areas, roads, OHV's, grazing and recreation. Then there is the threat of ugly congressional actions and executive orders similar to the Black Rock Desert and Steens Mountain.

Alternate A is, at the moment, the only good choice. It may buy time until this nation can find some decent politicians willing to support common sense. The EIS document claims that goals will be met under Alternate A, yet Alternate D is preferred simply because goals will be attained sooner. If goals can be met under Alternate A, then what are the compelling criteria for achieving them sooner under Alternate D? The answer is simple. Alternate D allows for more control over public and private land through watershed-scale management and those 12 juicy playgrounds (ACEC's).

282-24: The Proposed RMP/Final EIS has incorporated updated poverty statistics based on a December 13, 2001, file released by the Bureau of Census. The data represents 1998 estimates of poverty rates by state and county. Estimates based on the 2000 census have not yet been released for local areas. The display of historic economic data is adequate to establish the background and underlying trends necessary to provide context for the discussion of impacts in Chapter 4. Providing historic economic data dating back 30 to 40 years will not meaningfully add to the analysis.

282-25: The statement that the "... mountain big sagebrush fire regime where much juniper has encroached today, typically burned every 15 to 25 years ..." is correct to the best of our knowledge. Recent research by Dr. Richard Miller supports the idea that mountain big sagebrush typically burned every 15-25 years. However, there is little research specifically within the planning area that provides such evidence.

The BLM is working with Dr. Miller and other researchers to study the fire return intervals of different vegetation communities. In forested communities, many tree species have defense mechanisms that allow them to heal fire-damaged tissues. This usually occurs as a "cat face" and the charred fire scars allow accurate counting of fire scars in relation to annual growth rings over hundreds of years. In contrast, much of a sagebrush plant is consumed during a fire, which makes it much more difficult to accurately determine fire regimes and fire return intervals. One of the only ways to determine the fire return intervals is through ash layers in the soil or in sedimentary layers in adjacent ponds.

Sometimes rat middens provide some evidence of fires. Fire-scarred pines on the upper side of the mountain big sagebrush elevation range most likely determined the 15-25 year return interval. In the lower elevation range of mountain big sagebrush (no pines), there is much less direct evidence available. Juniper trees in the lower zone do not fire scar as readily as pines, and they do not lend themselves to tree ring analysis as well.

Keep in mind that the document was drafted during an extended drought period under Clintonian, Gore-ish rules propagated by Bruce Babbitt, former Interior Secretary, who detests the Republican form of government on which this nation was founded, and as exemplified by some of his quotes:

"The radical property rights crowd are anarchists at heart..." — Bruce Babbitt, 2001. The Fifth Amendment guarantees property rights. Babbitt despises the Constitution.

"Here we are, having achieved 80 percent of what was sought in legislation, by administrative rule." — Bruce Babbitt upon leaving office after the election of George W. Bush in 2001. So much for the constitutional form of government of this nation. Babbitt abuses, ignores and breaks existing laws, violates the Constitution, and advocates the dictatorial administrative rule process. But Babbitt isn't the only bad boy in town.

By "making it so expensive in their operation and by making so many changes for them to continue to raise their cattle...that they go broke." — Roy Elicker, Deputy Director of the Oregon Dept. of Fish and Wildlife, at a conference at the University of Oregon describing his strategy for driving cattle ranchers off public lands. The ODFW, other state wildlife agencies, and hundred of studies have shown that grazing is beneficial to wildlife. But, of course, Elicker and many others like him are now being paid to be politically correct.

In a 1998 memo from Donna Dam of the National Marine Fisheries Service (aka No More Fish Service) directing agency staff on how to handle designation of critical habitat when they lacked information about it: "We just designate everything as critical without analysis of how much habitat a [salmon population] needs, what areas might be key, etc ... We just say we need it all." Did she help draft the LRA EIS?

Don't think for one minute that the ICBEMP is not a product of collusion and conspiracy. The LRA EIS document is a product of the Babbitt's, Elicker's and Dam's of this country and forced upon local agencies through the ICBEMP. They, and other people like them, are politically motivated and lack the skills necessary for proper land management decisions. They, and so many others, have grossly misinterpreted Aldo Leopold in so many ways as exemplified by the following quotes from his book, *A Sand County Almanac, With Essays on Conservation from Round River*, 1966, Oxford University Press, Inc. (later reprints have been sanitized by environmental groups for propaganda purposes):

"The evolution of a land ethic is an intellectual as well as emotional process. Conservation is paved with good intentions which prove to be futile, or even dangerous, because they are devoid of critical understanding either of the land, or of economic land-use." (pg. 283). If we continue to allow land management decisions be dictated by intellectuals, emotions and the graphite exercises of radicals and judicial activists, then there is no future for wildlife or this county.

Leopold also despised people like Babbitt: "Let no man jump to the conclusion that Babbitt [sic] must take his Ph.D. in ecology before he can 'see' his country. On the contrary, the Ph.D. may become as callous as an undertaker to the mysteries at which he officiates" (pg. 291). He actually used the name Babbitt. This statement truly exemplifies the importance of weighing the knowledge of the local people who live in the area and who know the land better than itinerate land managers and outsiders (environmental groups) with nothing more than social engineering agendas and money on their minds.

"Perception, in short, cannot be purchased with either learned degree or dollar, it grows at home as well as abroad, and he who has a little may use it to as good advantage as he who has much." (pg. 292). Translation: You don't have to be an environmentalist or work for the government to know what's best and strongly suggests local control and cooperation.

"At what point will governmental conservation, like the mastodon, become handicapped by its own dimensions?" (pg 250). Dictatorial policies from Washington, DC, and judicial activism clearly justify the need for decentralization and local control in land management decisions. Land management has now become what Leopold feared most. The system is now so inflexible that rational decisions can no longer be made. Leopold's "mastodon" has become an alphabet soup of bureaucratic agencies and laws designed to inhibit any form of forward progress, or common sense, and enrich the pockets of agitators.

In describing the function of government in wildlife management, Leopold had this to say: "Actually, game administration in this country has so far concerned itself almost entirely with two things: regulating abuses by the exercise of its police powers, and attempting to practice management on private lands without the co-

282-26: The visitation number for the Abert Lake Watchable Wildlife Site has been corrected (see Table 2-47).

282-27: The discrepancy relating to estimated visits to the Warner Wetlands between the text and Table 2-47 has been corrected. The majority of the visits to this area are associated with the facilities at Hart Bar. As stated in the text, the correct estimate of visits is 8,000.

282-28: Refer to comment responses 282-7 and 282-8.

operation of the owner. The latter attempt is bound to fail in the long run, because government cannot control environment on lands which it does not own." (Game Management, Leopold, 1930). Seventy-two years later and we're still doing it all wrong. Leopold recognized private property rights and respected the Constitution. In fact, he owned a farm.

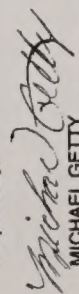
In describing the four categories of outdoorsmen Leopold had this to say: "The deer hunter habitually watches the next bend; the duck hunter watches the skyline; the bird hunter watches the dog; the non-hunter does not watch ... The biological jack-of-all trades called ecologist tries to be and do all these things. Needless to say, he does not succeed." (pg. 223). In Game Management he describes the qualifications required of a game manager: "Personal experiences with land and with farm, forest, or other land crops, and with dogs and shooting, is of course of great value." [emphasis added]. Our society has been so far removed from its rural beginnings that few people today are even remotely qualified to make land management decisions. Textbooks are not substitutes for a life-long existence with land and animal. Decisions are now based on political motives and misguided emotions.

I could list 20 more pages of objections I have to the EIS document, but, I simply don't have the time. Since Interior Secretary Norton has failed to address the deficiencies of the previous administration, it is imperative that objections to the EIS process and document be addressed to state and federal legislators. The people of Lake County have not been given due consideration or a choice in this matter.

Regardless of the fact that notices were published late or not received at all, the fact remains that the public could not have possibly responded to the EIS at the December 4th meeting simply because of the sheer size of the document itself. The public isn't paid nor does it have the time, nor was it allowed the time, to review, research and comment on bureaucratic endeavors such as this. One 2-hour public meeting to discuss a 20 year plan was wholly inadequate and reprehensible. There should have been public meetings throughout the entire process with local needs, uses and comments carrying more weight than all other sources combined. It is imperative that legislation be passed to re-establish local control. Politicized land management is unacceptable.

With that I leave you with the following: "A technician is a man who comes out to your ranch and tells you things you knew before, in terms you can't understand." --- Rueb Long, 1964

Respectfully,


MICHAEL GETTY
HUNTERS FOR CONSERVATION

282-29

282-29: Refer to comment response 282-1.



Oregon
John A. Kitzhaber, M.D., Governor

Department of Fish and Wildlife
Deschutes Watershed District
61374 Parrell Road
Bend, OR 97702
(541) 388-6363
FAX (541) 388-6281



March 22, 2002

US Department of the Interior
Bureau of Land Management
Lakeview District Office
HC 10 Box 337
Lakeview, OR 97630

ATTN: Todd Forbes

RE: Lakeview Resource Management Plan

Thank you for the opportunity to comment on this plan. I apologize for being slow in getting back to you with these comments.

Attached is your Volume 3 of the Draft LRMP with our additions and changes to your maps. This includes juniper treatment areas, sage grouse lek locations, road closures, etc.

Specific Comments:

SMA 1-23; We are not concerned with ACEC's restricting access with the exception that we would like to be able to construct 1-2 guzzlers in existing WSA's, and would like some juniper treatments within them.

Bighorn sheep AUM's; population estimate for lava beds would be 100 sheep which should equal 500 bighorn AUM's. 100 sheep @ 5 sheep / AUM = 20 AUM / month = 240 AUM / yr

We are ok with the modified proposal on closed roads which we discussed with you. See the attached map for comments. We have one further question of why the access road to the north of the lava flow could not be closed? We support the proposal adding the garden into the Silver Lake/Cabin Lake closure. We would like language included for administrative access for Oregon State Police and ODFW.

Please feel free to ask if you have any further questions.

Sincerely,

Steven George - Corey Heath
Deschutes Wildlife District
STEVEN.W.GEORGE@STATE.OR.US

RECEIVED
MAR 27 2002
LAKEVIEW, B.L.M.

283-1

283-2

283-3

283-1: These specific projects would be analyzed on a case-by-case basis in a future NEPA analysis. Although building guzzlers within a WSA is not totally precluded, it is discouraged and only permitted when historic water sources are no longer available. Juniper treatments within a WSA are allowed if they enhance the health of the area, are compatible with wilderness values, and are undertaken in a manner consistent with the wilderness IMP (USDI-BLM 1995b).

283-2: This change has been made to Table 2-26.

283-3: After further study of the roads within the Devils Garden lava flow, only those roads which do not appear in the wilderness inventory maps (USDI-BLM 1989a) would be closed on a permanent basis under the preferred Alternative D. The entire WSA would also be included within the Cabin Lake/Silver Lake Deer Winter Range Cooperative Seasonal Vehicle Closure under Alternative D (see Map SMA-24).

153

RECEIVED
MAR 27 2002
LAKEVIEW, B.L.M.

March 15, 2002

U.S. Dept of Interior
Bureau of Land Management
HC 10 Box 337, 1300 S.G St.
Lakeview, Or. 97630

Attn: Duane Sikes

I am addressing the proposed closures in North Lake County. Lake County has been trying to rebuild industry within the county and the proposed closures are a direct slap in the face. I am referring to the road closures in the Devils gardens, road closures in the conley hills and camping restrictions in the Sand Dunes and Lost Forest areas. Also a concern would be the proposed winter closure of BLM ground to the east of the Cabin Lake road.

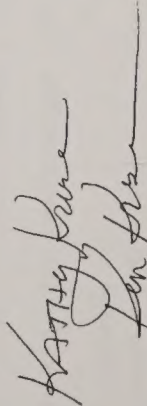
Road damage and wildlife winter range seem to be the concern. The involved roads are, for the most part, good rock based roads and have not to date suffered any permanent damage.

The wild life situation is a concern. These areas, the conleys and the area to the east of the Cabin Lake road, are the last stronghold against the invasion of the crop lands. If closed it will remove the only buffer against wildlife flooding the croplands. Similar closures have created a control problem in other areas.

The proposed closures will also limit the tourism that has been created, and supports the smaller communities, by out of town people that come out ot photograph and watch the elk and deer herds. This procedure has evidently not inhibited the breeding practices of the deer and elk as they appear to be reproducing at a fast rate. A herd of two hundred head of elk can be seen, at any given moment, traveling through the valley.

Bottom line is that Closures seem to be detrimental to all concerned. Would you please give this your attention and consider leaving things as they are.

Thank You



284-1

284-2

Note: Letters 284-288, 292-294, and 300-320 are form letters; letter 284 is reprinted here to represent the content of those letters.

284-1: Refer to comment response 282-9.

284-2: It is well documented that repeated disturbance to mule deer and elk on winter ranges can be detrimental to the condition and health of the animals. We proposed seasonally closing the roads east of the Cabin Lake road to decrease winter disturbance and improve mule deer herd conditions. Some private landowners in the area even supported the closure to the point of asking if they could include their private lands within the closure boundary. Wintering mule deer and elk can still be seen and photographed in the months before (October-November) and after (April-May) the seasonal closure, as well as along main highways and county roads that remain open year-round (see Map SMA-24).

RECEIVED
MAR 29 2002
LAKEVIEW, B.L.M.

March 28, 2002
Bureau of Land Management
Lakeview District
Highway 195 South
Lakeview, OR 97630

RE: My comments on "Draft of Resource Management Plan" (RMP)

To Whom It may Concern,

As a property owner in Christmas Valley, I would like to comment on the draft Resource Management Plan for the Lakeview Resource Area of the Bureau of Land Management. We appreciate receiving the EIS that we requested and all the information we got from your representatives when they visited our chamber meetings.

I personally am against designating 12 new Areas of Critical Environmental Concern (ACEC's), 10 of them to be Research Natural Areas (RNA's) and expanding the three existing Wilderness Study Areas (WSA's) by adding 1,194 acres. I am quite aware of an ordinance adopted on Aug. 19, 1992, by our Lake County Commissioners, stating that "No additional wilderness, roadless or research areas shall be designated in Lake County. As found in Section 7.3 of Ordinance No. 24, an Interim Public Land Management Plan. I am sure the intent here was to prohibit the designation of "Special Management Areas". I am also opposed to the designation of ACEC's and Wild and Scenic Rivers.

However, I believe the Bureau of Land Management is doing a great job with their current management strategies. The concerns about use of the Sand Dunes and The Lost Forest are appreciated and I would like to see alternative camping areas, that are less sensitive, in nearby locations. To restrict use of these areas, (by closing some roads, etc.), to recreational users, that have been used for many years, PUBLIC LANDS, I believe, would be a regrettable decision. To help prevent further damage to the natural resources more information should be made available to the public about the uniqueness and sensitivities of the area.

I have only lived here a little over three years but I can see how the local economy would be negatively affected if the tourist and recreational traffic was suddenly brought to a halt. Please take into consideration the above and I would like to add that, in my opinion, the present management of the lands are sufficient.

Sincerely,

Willie Shelton
Vered T. Shelton

289-1

289-1: Refer to comment response 202-2.

Mar. 27

Bureau of Land Mng.
 Lake View Dist.
 Highway 195- Route
 97630
 Muncie, Ar

RECEIVED
 MAR 29 2002
 LAKEVIEW, B.L.M.

Bl. M. Rept.

I've lived in Christina Valley
 for 3 yrs and concerned about
 the road's impacts & areas in
 the road's vicinity. Have your doc. &
 W. n. County. Its road forest,
 hard to understand. In 1992 Commissioner
 had been stated that no wilderness would be
 put in studies. Please keep me notified if any

Change Sincerely
 Nelson Ruedel at
 dar@bendnet.com

290-1

290-1: Refer to comment response 22-2.

L-290

John Widenoja
85955 Raven Ridge Ln.
Silver Lake, OR 97638

Mar. 26, 2002

Scott Florence
Bureau of Land Management
Lakeview Office
1301 South G.
Lakeview, OR 97630

Dear Scott,

As usual, I have procrastinated past the normal comment period, but considering the potential impact road closures in North Lake could have on local business and recreational activities I feel a need to respond to the "Draft Resource Management Plan/Environmental Impact Statement."

Hundreds of OHV recreationists travel hundreds of miles to explore all the fun nooks and crannies in Lake County. The Christmas Valley area in particular was created with recreation in mind 40 years ago. A case that closing back roads will dampen recreation, tourism and real estate sales can easily be made. A parallel case can be constructed that a higher socio economic level buyer will come to the Christmas Valley area if it retains notoriety for recreation.

The numbers show that the Christmas Valley town site grew in population from 247 in 1990 to 470 two years ago in 2000. That amounts to a 90.3% growth rate and accounts for 57% of population growth in Lake County's unincorporated areas. This growth is not solely because of inexpensive property. The greater number of new CV residents are retirees who relocate here in part because of recreation the area offers.

Just as tax dollars help build logging roads to allow removal of natural resources, roads should remain in place to allow local access and recreational use of our scenic resources here in Lake County. The county once profited greatly from natural resources in the form of logging jobs and timber receipts. Now that those boom days have passed, the county needs to look to another use of natural resources in the form of recreation and tourism to help maintain our economies.

Thank you for your consideration,

John Widenoja

John Widenoja

291-1

291-1: Refer to comment response 22-2.

294-1

WE, THE UNDERSIGNED, ARE CONCERNED LANDOWNERS, LOCAL RESIDENTS AND RESOURCE USERS THAT ARE CONCERNED ABOUT THE PROPOSED ROAD AND CAMPSITE CLOSURES, BEING ADDRESSED BY THE BUREAU OF LAND MANAGEMENT. WE DO NOT WANT TO SEE WINTER CLOSURES OF ROADS INSIDE THE DEVILS GARDENS, THE CONNLEY HILLS AND THE PROPOSED CAMPSITE CLOSURE AT THE SAND DUNES AND LOST FOREST IN NORTH LAKE COUNTY. WE DO NOT WANT A WINTER CLOSURE ON THE BLM GROUND ON GROUND TO THE EAST OF THE CABIN LAKE ROAD IN NORTH LAKE COUNTY.

PRINT NAME	ADDRESS	SIGNATURE
------------	---------	-----------

Note: This petition had 496 signatories on several form letters.

294-1: Refer to comment response 22-2.

RECEIVED

APR - 1 2002

LAKEVIEW, B.L.M.

March 26, 2002

Bureau of Land Management
Lakeview, Oregon

This letter is written in support
of Option A - Resource Management
Plan.

North Lake County is dependent
on Tourism, and the Sand Dunes,
Lost Forest, Crack-in-the-Ground
and Green Mountain are a small
few of the places that are visited.

We do not want roads closed in
this area. They need to remain
open for hunting, recreation and
sight seeing.

Sincerely,

Gee & Fran Baxter - P.O. Box 73
Christmas Valley, OR 97641

295

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APR - 1 2002

LAKEVIEW, B.L.M.

March 27, 2002

Bureau of Land Management
Lakeview District
Highway 195 South
Lakeview, OR 97630

RE: My comments on "Draft of Resource Management Plan" (RMP)

To Whom It may Concern,

As a Chamber of Commerce member and a business owner in Christmas Valley, I would like to comment on the draft Resource Management Plan for the Lakeview Resource Area of the Bureau of Land Management. We appreciate receiving the EIS that we requested and all the information we got from your representatives when they visited our chamber meetings.

I, personally am against designating 12 new Areas of Critical Environmental Concern (ACEC's), 10 of them to be Research Natural Areas, (RNA's) and expanding the three existing Wilderness Study Areas, (WSA's) by adding 1,194 acres. I am quite aware of an ordinance adopted on Aug. 19, 1992, by our Lake County Commissioners, stating that "No additional wilderness, roadless or research areas shall be designated in Lake County. As found in Section 7.3 of Ordinance No. 24, an Interim Public Land Management Plan. I am sure the intent here was to prohibit the designation of "Special Management Areas". I am also opposed to the designation of ACEC's and Wild and Scenic Rivers.

However, I believe the Bureau of Land Management is doing a great job with their current management strategies. The concerns about use of the Sand Dunes and The Lost Forest are appreciated and I would like to see alternative camping areas, that are less sensitive, in nearby locations. To restrict use of these areas, (by closing some roads, etc.), to recreational users, that have been used for many years, PUBLIC LANDS, I believe, would be a regrettable decision. To help prevent further damage to the natural resources more information should be made available to the public about the uniqueness and sensitivities of the area.

I have only lived here a little over two years but I can see how the local economy would be negatively affected if the tourist and recreational traffic was suddenly brought to a halt. Please take into consideration the above and I would like to add that, in my opinion, the present management of the lands are sufficient.

Sincerely,

Bruce Brandenburg
Bruce Brandenburg

296-1

296-1: Refer to comment response 22-2.

L-296

KRUSE RANCH
PO BOX 10 KRUSE RD.
FORT ROCK, OR. 97735
541 576-2348



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APR 3 2002
LAKEVIEW, B.L.M.

March 27, 2002

U.S. Dept of Interior
Bureau of Land Management
HC 10 Box 337, 1300 So. G. St.
Lakeview, Or. 97630

Attn: Duane sikes

Enclosed you will find letters and petitions addressing the closing of roads and camping areas in northern Lake county. The time we had to react to these closures was very short and I would expect that there would have been way more input if we had been aware of the closures earlier in the year.

I feel that the proposed closures should have been advertised and addressed to the communities it will effect. Had it not been for a chance meeting with local officials in Lakeview, these closures would have gone into effect without many of knowing about the closures.

Please take the time to consider the consequences of what these closures will do the the communities and the ranchers involved.

similar closures around farm land has resulted in wildlife infestation to the point where it is impossible to keep them out of the fields. We need these "buffer" areas, the Connleys and the BLM ground North and West of Fort Rock, to attempt to control The Elk and Deer. The closure would actually move the "front line" up to the private land.

Closing the smaller roads inside the Devils Gardens will eliminate the sunday outings for some of the older locals that have lived and traveled these roads for years. We grazed the gardens for many years and can't see that there has been any damage to the roads, and the wildlife moved out with the cows.

Please give this your careful consideration. Many lifestyle changes could be effected by the simple stroke of a pen. Leave Fort Rock as it is. Thank you for your time and I would love to hear back from you.

Yours

Kathleen G. Kruse

297-1

297-1: Refer to comment responses 22-2 and 282-1.

297-2

297-2: Refer to comment responses 282-9 and 283-3.

LAKESIDE TERRACE RESTAURANT, MOTEL & RV PARK

□□□□□□□□□□□□□□□□

P.O. Box 767 ♦ Christmas Valley, OR 97641
Phone 1-541-576-2309 ♦ Fax 1-541-576-2309

March 29, 2002

Bureau of Land Management
Lakeview District
Highway 395 South
Lakeview, OR 97630

RE: Comments on Draft of Resource Management Plan(RMP)

To Whom It May Concern:

As business owners and Chamber of Commerce members here in Christmas Valley, we would like to comment on the draft Resource Management Plan for the Lakeview Resource Area of the BLM. We do appreciate the information provided to us by your representatives at our chamber meetings and the three-volume EIS that were sent to us, as requested.

However, we are **opposed** to the proposed designation of 12 new Areas of Critical Environmental Concern (ACEC's), 10 of them to be Research Natural Areas(RNA's) and expanding the 3 existing Wilderness Study Areas(WSA's) by adding approximately 1,194 acres. We are also **opposed** to the designation of ACEC's and Wild and Scenic Rivers.

We would ask you to take note of the fact that our Lake County Commissioners adopted an ordinance on Aug. 19, 1992, stating that "No additional wilderness, roadless or research areas shall be designated in Lake County", (Section 7.3 of Ordinance #24, an Interim Public Land Management Plan). It seems like you RMP would be in direct conflict with that ordinance.

The BLM, in our opinion, is doing a commendable job with their current management strategies. We certainly appreciate the concerns about use of the Sand Dunes and the Lost Forest and would like to see more information available to the public about the uniqueness and sensitivities of these areas so that people would be more aware and help prevent damage to these natural resources. These areas are very popular with recreational users and to restrict access to **PUBLIC LANDS**, that have been in use for so many years, would be a grave error.

In the seven years since we have been in business here, we have witnessed a steady economic growth of this area and increase of much-needed public services, much of which is due to revenues generated by tourism. Please consider what any drastic changes could do to our local economy. **We would remind you that man was not created for the land, but that the land was created for man to use and enjoy!**

Sincerely,

Kerry & Cardwell
Carmen K Cardwell

Kerry R. Cardwell
Carmen K. Cardwell

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APR - 2 2002
LAKEVIEW, B.L.M.

298-1

298-1: Please see response to comment 22-2.

L-298

March 31, 2002

Dwayne Sykes
Dear Sir

We are Senior Citizens, my husband will be 74 in Sept, I will be 73 in May, People tell us, Why do you care? I tell them, It's for the future generations, to be able to see & see the land & the Wild Life. We travel the back roads often & enjoy the peace & quiet.

I am against closing the roads. to police them would cost too much.

I am against closing the Dunes.
you could put in a parking lot & charge the users to use them, also you could put in some Campgrounds for users to stay

The money from this would pay to have someone police them. We have the last free use Sand Dunes in Oregon, Chuck with Florence on how they maintain their Dunes, this is something to consider, instead of closing

I am against closing grazing, you would lose the money you get from this as for the Lost Forest. Opened only to spic-toms & such

1. Don't close the roads 2 Don't close Grazing
3. Don't close the Dunes 4. Lost Forest? Betty Anne Chapman

